

Review of CRL's Response to Mazur

July 2026



Integrity



Excellence



Fairness



Transparency



Efficiency



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Executive Summary

CRL successfully maintained regulatory delivery during an unprecedented period of operational pressure, but the response exposed weaknesses in communications, systems, scalability and crisis preparedness.

The Mazur judgment created significant uncertainty for the legal profession and disrupted long-established expectations regarding litigation practice rights. The review found that the organisation adapted effectively to the challenges. Although the initial response was necessarily reactive and constrained by existing systems, CRL rapidly redesigned processes, expanded operational capacity and established a more structured operating model. As a result, CRL processed more than 1,000 applications for litigation practice rights. This represented more than ten times the organisation's usual application volume while continuing to deliver its core regulatory functions during a period of sustained operational pressure.

The review identified three particular strengths. First, leadership and governance arrangements enabled decisions to be made quickly despite considerable uncertainty. Second, staff demonstrated exceptional adaptability, commitment and collaboration throughout the response. Third, the organisation showed a strong capacity to learn and improve, introducing new processes, guidance and reporting arrangements as the situation evolved.

However, the review also identified important lessons. Communications emerged as the most significant area for improvement, with many applicants experiencing delays, limited updates and uncertainty regarding their progress. The response also highlighted a heavy reliance on manual processes, spreadsheets and key individuals, exposing vulnerabilities in organisational resilience. Finally, while governance arrangements generally worked well, the organisation relied heavily on informal relationships and existing trust rather than predefined crisis-management structures.

These findings suggest that future resilience will depend on strengthening communications capability, improving operational scalability and establishing more formal crisis preparedness arrangements.

Purpose of the Review

The review was commissioned by the Board to assess the effectiveness of CRL's response to the Mazur judgment, identify lessons learned and strengthen organisational preparedness for future high-impact events.

The Mazur judgment created significant uncertainty for Chartered Legal Executives conducting litigation in various capacities and resulted in unprecedented increase in applications for practice rights, enquiries and stakeholder engagement. CRL was required to develop and implement new regulatory arrangements at pace whilst continuing to deliver its core regulatory functions. The scale and complexity of the response placed considerable pressure on operational capacity, system and communication.

The review was undertaken to understand how effectively the organisation responded during a period of sustained uncertainty and exceptional demand, and to identify improvements that will strengthen future resilience.

The review considered four broad questions:

How effectively did CRL adapt its operations?

Assessing the timeliness and effectiveness of operational decisions, process changes and resource deployment.

How resilient was the organisation under pressure?

Assessing the extent to which systems, people and governance arrangements were able to sustain performance during a prolonged period of disruption.

How effectively did CRL communicate with stakeholders?

Assessing the clarity, consistency, timeliness and tone of communications with applicants, staff and external stakeholders.

Were governance and oversight arrangements fit for purpose?

Assessing how decisions were made, risks were escalated and oversight was maintained during a rapidly evolving situation.

Methodology

The review adopted a mixed-methods approach, combining qualitative and quantitative evidence from internal and external stakeholders. Evidence was assessed across multiple sources to identify consistent themes, areas of divergence and underlying causes of both positive and negative outcomes.

The review was conducted internally by the Director of Policy and Governance and the Policy and Research Officer, both of whom were operationally removed from the day-to-day delivery of the Mazur response. This approach enabled the review to be completed in a timely and cost-effective manner while maintaining appropriate separation from the operational activities under review. The review was commissioned by the Board and sponsored by a lay Board member, who provided oversight and challenge throughout the process.

The review drew on four principal sources of evidence:

Documentary Review

Review of key documents, communications, reports and materials produced throughout the Mazur response.

Stakeholder Interviews

Ten semi-structured interviews with internal and external stakeholders involved in the response. Interviews explored operational effectiveness, organisational resilience, communications and governance arrangements.

Staff Engagement

An organisation-wide staff engagement session to gather wider reflections on organisational performance, resilience and lessons learned.

Applicant Feedback

A survey of current and recent litigation practice rights applicants, generating 203 responses, supplemented by follow-up qualitative discussions with 3 applicants to explore experiences in greater depth.

Operational Response

CRL adapted its operational response effectively, although the initial response was constrained by limited systems, capacity and visibility of the scale of demand

The review found that CRL responded effectively to an unprecedented increase in demand following the Mazur judgment. While the organisation initially relied on existing processes designed for relatively low volumes of practice rights applications, it demonstrated a strong ability to adapt its operating model as the scale and complexity of the challenge became clearer.

Several stakeholders acknowledged that the full implications of the judgment were not immediately understood and that the likely volume of applications was initially underestimated. Existing systems, workflows and staffing arrangements were not designed to accommodate the sudden increase in demand, resulting in a highly reactive early response characterised by manual processes, spreadsheets and temporary workarounds. Internal stakeholders consistently described the organisation as operating in a "firefighting" mode during the initial stages of the response.

Despite these challenges, CRL introduced a series of significant operational improvements as well as guidance, FAQs and supporting documentation. Operational improvements included redesigning application processes, expanding assessor capacity, recruiting additional staff, introducing online application functionality, strengthening workflow management and improving management information and performance reporting. Internal and external stakeholders broadly agreed that the process became increasingly structured, efficient and effective over time, with later applicants generally experiencing a more stable and predictable process than those who applied during the earliest stages.

The response demonstrated considerable organisational agility and a willingness to adapt quickly in the face of uncertainty. However, the review also identified opportunities to strengthen future resilience through greater automation, improved case management systems, enhanced workflow visibility, better performance reporting and earlier capacity planning. The experience highlighted the importance of scalable operational systems capable of supporting exceptional demand without excessive reliance on manual intervention or individual expertise.

Key evidence:

-  Assessors expanded from 5 to 26
-  Recruited 3 additional operational staff
-  1,100+ applicants obtained litigation practice rights by June 2026
-  Average time to authorisation reduced to 10.5 weeks
-  Guidance, FAQs and other supporting documents developed and updated

Received "my litigation practice rights just over 6 weeks from submission"

- **applicant survey response**

Organisational resilience

CRL sustained operations throughout a prolonged period of exceptional demand, although resilience relied heavily on staff commitment, adaptability and key individuals

The review found that CRL demonstrated a high degree of organisational resilience during the Mazur response. Despite sustained operational pressure, increasing application volumes and significant stakeholder scrutiny, the organisation continued to deliver its core regulatory functions while implementing substantial operational change.

A consistent theme across interviews was the strength of the organisation's culture. Staff described high levels of collaboration, mutual support and shared purpose throughout the response. Leadership was widely viewed as visible, accessible and supportive, helping to maintain morale during a prolonged period of uncertainty. Several stakeholders highlighted the willingness of individuals across the organisation to take on additional responsibilities and adapt quickly to changing priorities.

However, the review also identified important vulnerabilities. The response depended heavily on a relatively small number of individuals with specialist knowledge and operational expertise. In several areas, critical processes relied on informal knowledge, individual initiative and personal relationships rather than documented systems and established contingency arrangements. While this flexibility enabled the organisation to respond quickly, it also increased organisational risk and reduced resilience should key personnel have become unavailable.

The experience demonstrated that CRL possesses a committed and adaptable workforce capable of operating effectively under pressure. However, future resilience will require greater investment in knowledge management, documented processes, workforce flexibility and succession planning to ensure that organisational resilience is less dependent on individual effort and expertise.

"I'm incredibly proud of the staff and how they responded, because they faced... quite difficult situations with applicants.. But internally, it was a very supportive environment, and people really looked out for each other." --

Internal stakeholder interview

"The supportive internal culture prevented individuals from 'crumbling' under pressure."

— Internal stakeholder interview

Communications

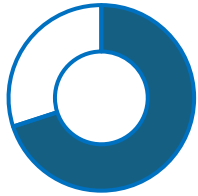
Communications emerged as the most significant area for improvement, with stakeholder perceptions shaped as much by communication experiences as by operational outcomes

The review found that communications represented the most consistent source of stakeholder dissatisfaction during the Mazur response. While CRL ultimately succeeded in processing applications and adapting its operational model, many applicants experienced the process as slow, opaque and difficult to navigate. Long periods without updates, uncertainty regarding timescales and limited visibility of application progress contributed to frustration, anxiety and reduced confidence in the process. Survey findings indicate that 80% of respondents expressed negative views about communications and 64% expressed negative views regarding the timeliness of the application process.

A recurring theme across both internal and external interviews was that communication challenges were closely linked to wider operational constraints. Staff were simultaneously responsible for progressing applications, managing high volumes of correspondence and responding to stakeholder enquiries. As application numbers increased, CRL made a deliberate decision to prioritise authorisations and application processing over individual communications. While this approach improved operational throughput, it reduced responsiveness and contributed to perceptions that applicants were being ignored.

The review also identified concerns regarding tone and empathy. Although communications were generally accurate and intended to provide clarity, many stakeholders felt they did not sufficiently acknowledge the uncertainty and anxiety experienced by applicants. Several interviewees reflected that communications became increasingly procedural and process-focused during periods of peak demand, reflecting the fact that operational delivery was being prioritised at the expense of applicant experience.

The evidence suggests that communications should be viewed as a core component of operational delivery rather than an endpoint messenger function. Future resilience will depend on stronger communications capability, improved self-service tools, clearer service standards and greater visibility of application progress, alongside continued efforts to ensure communications remain clear, timely and empathetic during periods of heightened stakeholder concern.



70% of portfolio applicants were dissatisfied with communications during the application process

"Communication. Acknowledge things, maybe provide a visual timeline showing the status of an application." —

Applicant survey response

Governance and Oversight

Governance arrangements supported an effective response, although crisis decision-making relied more on organisational agility and existing relationships than formal crisis-management structures

The review found that governance and oversight arrangements generally enabled CRL to respond effectively to the challenges created by the Mazur judgment. Internal stakeholders consistently described leadership as visible, responsive and willing to make decisions quickly in the face of significant uncertainty. The Board remained engaged throughout the response, receiving regular updates and providing appropriate oversight without becoming involved in operational delivery. Stakeholders broadly viewed the balance between executive decision-making and Board oversight as proportionate and effective.

A key strength of the response was the organisation's ability to adapt quickly. Delegated authority, close working relationships and a high degree of trust between the Board and executive team enabled decisions to be taken rapidly as circumstances evolved. This agility allowed CRL to implement operational changes, recruit additional capacity and respond to emerging risks without significant bureaucratic delay. Several stakeholders viewed the organisation's size and flexibility as important factors in its ability to respond effectively.

However, the review also identified opportunities to strengthen governance arrangements for future high-impact events. The response was largely managed through existing governance mechanisms rather than a predefined crisis-management framework. Stakeholders highlighted the absence of formal crisis escalation arrangements, structured horizon scanning processes and clearly documented crisis governance procedures. There was also evidence that the significance of the judgment was not fully recognised at the earliest stages, raising questions about how emerging risks are identified, assessed and escalated across the organisation.

The experience suggests that CRL's governance arrangements were effective because of strong leadership, organisational trust and individual judgement. Future resilience would be strengthened by formalising crisis governance arrangements, clarifying escalation routes, strengthening risk identification processes and ensuring governance structures can adapt quickly during periods of exceptional operational pressure.

“One of the benefits of how we operate [is] quite a small board. It can be quite agile. You can make decisions quite quickly... there is a healthy challenge on the board, but there’s a degree of trust that the executive is in charge of delivering operational matters...” –

internal stakeholder interview

Lessons Learned

The Mazur response highlighted five lessons that will strengthen CRL's future resilience, preparedness and stakeholder confidence

1. Operational resilience depends on systems that can scale rapidly

CRL ultimately adapted successfully to exceptional demand, but the response relied heavily on manual processes, spreadsheets and workarounds. Future resilience will require systems, workflows and management information that can scale quickly without creating operational bottlenecks.

2. Organisational resilience should not depend on individuals

The response benefited from exceptional commitment, adaptability and leadership. However, the experience exposed vulnerabilities associated with key-person dependency, informal knowledge and concentrated expertise. Sustainable resilience requires stronger organisational capability rather than reliance on individual effort.

3. Effective communication is essential to stakeholder confidence

Stakeholder experience was shaped not only by regulatory outcomes, but by the quality, timeliness and transparency of communications. Communications should be viewed as an integral part of service delivery, particularly during periods of uncertainty and heightened stakeholder concern.

4. Stakeholder confidence depends on both outcomes and experience

The review demonstrated that stakeholders judge organisations not only on what they achieve, but on how they achieve it. While CRL ultimately delivered important operational outcomes, stakeholder perceptions were often shaped by communication, responsiveness and visibility of progress. Maintaining confidence requires organisations to balance efficiency, regulatory integrity and operational delivery with transparency, responsiveness and empathy.

5. Crisis governance should be established before a crisis occurs

Governance arrangements enabled rapid decision-making, but the response relied heavily on organisational agility, trust and existing relationships. Future preparedness would be strengthened by predefined crisis governance arrangements, escalation routes and risk-management processes.

What Mazur Revealed About CRL's Preparedness

CRL's response was ultimately successful because of organisational agility, leadership and staff commitment, but the experience exposed vulnerabilities that should be addressed before future high-impact events

Area	Strength Demonstrated	Vulnerability Exposed
Operational Response	Strong adaptability and ability to redesign processes quickly	Systems and workflows were not designed to scale rapidly under exceptional demand
Organisational Resilience	High levels of commitment, collaboration and shared purpose	Significant reliance on key individuals, informal knowledge and personal expertise
Communications	Extensive engagement through guidance, webinars and stakeholder updates	Limited responsiveness, visibility of progress and stakeholder confidence during periods of uncertainty
Governance & Oversight	Agile decision-making supported by strong leadership and Board engagement	Reliance on existing relationships and organisational trust rather than formal crisis governance arrangements

Recommendations

CRL should focus on six priority actions to strengthen future resilience, improve stakeholder experience and enhance crisis preparedness

1. Operating Systems and Processes

CRL should strengthen its operational systems and workflow management, reducing reliance on manual processes and spreadsheets. Investment in scalable case management, automation and accurate, timely performance reporting would improve operational efficiency and support future periods of exceptional demand.

2. Organisational Resilience

CRL should reduce dependency on key individuals by strengthening knowledge management, documenting critical processes and increasing flexibility in how resources are deployed. Future resilience should be built into organisational capability rather than relying on individual effort and expertise.

3. Communications

CRL should strengthen its communications capability by establishing clear service standards, improving enquiry management and ensuring sufficient communications capacity is available during periods of heightened demand. Communications should balance regulatory clarity with transparency, responsiveness and empathy.

4. Applicant Journey and Self-Service

The applicant experience should be improved through clearer guidance, enhanced website usability and greater self-service functionality. Providing applicants with a clearer understanding of requirements, timescales and application progress would reduce uncertainty and improve stakeholder confidence.

5. Governance and Preparedness

CRL should establish more formal crisis management and preparedness arrangements, including clear escalation routes, decision-making responsibilities and business continuity planning. These arrangements would support more structured responses to future high-impact events while retaining organisational agility.

6. Strategic Positioning

CRL should more clearly define and communicate its role as a regulator and the support it can reasonably provide to applicants in this role. Greater clarity regarding service levels and standards are required to manage stakeholder expectations and ensure communications remain consistent with the organisation's regulatory responsibilities.