

CILEx and CILEx Regulation

**Application by CILEx and CILEx
Regulation to the Legal Services
Board under section 51 of the Legal
Services Act 2007 for the approval
of practising fees 2017**

1 INTRODUCTION

CILEx is an Approved Regulator under the Legal Services Act 2007 for Chartered Legal Executives, Associate Prosecutors, CILEx Practitioners and entities. CILEx delegates its regulatory functions to CILEx Regulation.

This submission sets out fees proposed to be charged for subscription year January to December 2017 to the following:

- Chartered Legal Executives (CILEx Fellows);
- Associate Prosecutor members of CILEx;
- CILEx Practitioners; and
- entities.

CILEx Fellows are regulated for the reserved activity of administration of oaths. Associate Prosecutor members are employed by the CPS and authorised to conduct litigation and exercise rights of audience.

CILEx Practitioners are authorised to provide one or more of the following reserved or regulated legal activities:

- conduct of litigation;
- rights of audience;
- probate;
- reserved instrument activities;
- immigration advice and services.

Entities may apply for authorisation to deliver one or more of the reserved or regulated legal activities. Entities pay an annual regulatory fee and make a contribution to the Compensation Fund.

CILEx Regulation Board determined the regulatory costs for the 2017 budget at its March 2016 meeting. CILEx Council agreed proposals for 2017 fees at its July 2016 meeting.

CILEx Regulation continues to set its budget independently against its strategy and annual business plan. A review it undertook in December 2015 determined the strategic aims and key activities for 2016-19 and thereby the resource needs of CILEx Regulation for 2017.

CILEx confirms that requests for reasonable additional resources will continue to be met. CILEx Regulation confirms it has no concerns about securing such resources.

2 OVERVIEW OF FEE PROPOSALS

The fee proposals for 2017, following consultation, are as follows:

Fee type:	Paid by:	2016	Proposed 2017
PCF	CILEx Fellow	£355	£364
PCF	Associate Prosecutor	£176	£220
Per practice right top up	CILEx Fellow with practice rights	£50	£60
Per practice right top up	CILEx member below Fellow grade with practice rights	£50	£60
PCF	Non-member of CILEx with practice rights	£450	£450
Entity application/renewal	Entity	Variable as fee scale	+1.5%

The CILEx Group draft 2017 budget identifies that regulatory activities will be covered by a PCF of £364 representing a 2.5% increase, necessary to cover direct regulatory expenditure and go towards covering permitted purposes. Reassessment of direct regulatory expenditure and the allocation of shared services costs to CILEx Regulation for the first time has meant that the PCF must increase, albeit modestly.

Restructuring within CILEx has mitigated against a larger increase. Efficiencies from planned investment in technology and improved administrative processes are intended deliver stabilisation of the PCF in the following two years.

3 BUDGET SETTING AND IDENTIFICATION OF RESOURCE NEEDS

The CILEx Group develops three year budgets and business plans. Business and strategic planning have enabled resource needs to be identified from which budgets for 2017 have been produced.

The CILEx Group budget process has three phases:

- strategy development;
- development of a draft budget for the following year incorporating the CILEx Regulation budget;
- development of a three year Group budget incorporating the CILEx Regulation three year budgets.

The strategic phase considers the political, economic, regulatory and competitive context of the sectors and markets the CILEx Group operates in. This informs the development of three year financial projections.

Assumptions are made regarding inflation, resource requirements, the numbers of authorised persons and other grades of CILEx member, and likely income from awards (i.e. examinations) and commercial activities carried out by the Group.

The CILEx Regulation Board set key activities for CILEx Regulation to achieve in order to deliver goals set out in its 2016-2019 strategy. From this, CILEx Regulation identified the activities and resource needs for 2017. A draft working budget was considered by CILEx Regulation’s Board on a preliminary basis on 22 March and agreed on 7 April 2016.

3.1 Permitted purposes

The CILEx Director of Group Services produced details of the costs of permitted purposes activities following analysis by each relevant staff team of the permitted purposes work it undertakes, as a percentage of its work overall. The percentages identified as a result of this exercise were as follows:

CILEx Department	All Permitted Purposes Activities	Other Activities	Total
Sales and Development	36.1%	63.9%	100%
Education	62.6%	37.4%	100%
Policy and Governance	40.0%	60.0%	100%
Communications and Marketing	8.0%	92.0%	100%
Central Resources	54.0%	46.0%	100%

The percentages are based on assessment by the CILEx management team of the amount of departmental time their teams spend on all permitted purposes activities or in providing services to CILEx Regulation under a service level agreement.

The ‘Other Activities’ column relates to work carried out by CILEx staff which does not relate to regulatory or permitted purposes activities e.g. in relation to Journal content aimed at CILEx members from a representative point of view or, in relation to the work of paralegals, which does not relate to professional membership programmes.

Those activities that CILEx identified as permitted purposes include:

- CILEx Sales & Development (formerly Membership) – provides and maintains the Fellows, Associate Prosecutor and member database; issues PCF invoices; liaises with authorised persons; maintains CPD records; provides information to CILEx Regulation about authorised persons and members;
- CILEx Education (formerly Awards) – provides support to ensure standards of qualification, training and assessment are fit for purpose; provides details of assessment results by candidate, centre and student; provides reports and minutes of relevant committee meetings; liaises with Ofqual; provides details

of any alleged misconduct; attends stakeholder meetings; attends professional institute forums;

- CILEx Journal (now part of Communications and Marketing) – provides the Journal on line and in print; editorial support; educational articles; direct mailing to authorised persons and members;
- CILEx Policy and Governance (formerly Regulatory Affairs) – provides representation, liaison and support in the areas of law reform, policy, lobbying, equality and diversity, pro bono and judicial appointments. Manages relationship with LSB, other Approved Regulators and government;
- CILEx Communications and Marketing – maintains and supports the CILEx Regulation website; CILEx Regulation publications; press releases; marketing plan and strategy; supports the marketing of new regulatory activity;
- CILEx central resources – HR; finance and accounting; procurement, and facilities.

The CILEx Group draft 2017 budget (Appendix 1) identifies that regulatory activities carried out by the Group will be covered by a PCF of £364, projected to generate £2,335,184. PCF income is expected to cover the regulatory activities expenditure of the Group, but not all other permitted purposes expenditure. This is provided from other sources, and as such these other sources of income subsidise the full cost of permitted purposes activities.

The overall increase in the PCF by 2.5% to £364 is necessary to cover the direct regulatory expenditure of CILEx Regulation and CILEx, and to go towards covering permitted purposes. The reassessment of direct regulatory expenditure and the allocation of shared services costs to CILEx Regulation for the first time has meant that the PCF must increase, albeit modestly. Restructuring carried out by CILEx has mitigated against a larger increase. The projected stabilisation of the PCF in the following two year period will be facilitated by the efficiencies that will accrue from planned investment in technology and improved administrative processes.

Stabilising the PCF over a three year period is the underlying objective of the forecast. However, CILEx Council has expressed its intention to reduce the PCF. Hence, when the effects of work to improve efficiency and reduce costs allow, they will be passed on by a reduction in the PCF as soon as possible.

The CILEx Regulation Board is satisfied that the analysis gives a fair reflection of the permitted purposes costs and reflects the activities undertaken by CILEx staff under a service level agreement between CILEx and CILEx Regulation, as well as the costs of permitted purposes activities carried out by CILEx as Approved Regulator.

The budget and regulatory costs agreed by CILEx Regulation were provided to CILEx to inform its budgeting process and to enable the proposed PCF for 2017 to be agreed.

3.2 Development of the 2017 draft budget

In 2015 it became apparent that the outturn for the CILEx Group would be considerably worse than budget for that year. In CILEx, a combination of income shortfalls and unplanned but necessary additional expenditure produced an unacceptably high forecast deficit for 2015. The management team proposed, and CILEx Council agreed, a series of restructures and cost saving measures. Detailed planning took place throughout 2015. Implementation began in late 2015. The restructuring was in the Chartered Institute and not CILEx Regulation, which sets its own budgets and plans independently.

Restructuring was intended to focus available resources on services to Fellows and other members in a cost-effective way, whilst reducing the cost base of the Chartered Institute. The original restructure proposals, included in the Group's 2016 budget, indicated annual savings of £520k with one-off restructuring costs of £241k in 2016. However the majority of the restructuring within the Chartered Institute actually took place earlier than planned (at the end of 2015) and so associated costs were also taken in 2015.

Restructuring in the Chartered Institute resulted in a reduction from six departments to five and reduced the cost base considerably. The effects have been incorporated into the draft 2017 budget. With 2016 being a transitional year, the Group draft 2017 budget is set to break-even.

In preparation for greater regulatory independence and establishing the true cost of regulation, the draft 2017 budget includes an allocation of shared services to CILEx Regulation, totalling £109,200. Previously, the cost of accounting, HR, IT and facilities were not charged to CILEx Regulation. In terms of the 2017 PCF at £364, the proportion covering shared services is £16.53 (or 4.5%). As stated, in prior years shared services were not charged to regulation.

Appendix 1 shows the total CILEx Group draft budget for 2017. This analyses income and expenditure by regulatory-related activity, other permitted purposes activity (with a sub-total for total permitted purposes activity), other activities that are not regulatory or other permitted purposes activities, and grand total for the Group.

3.3 CILEx Group three year forecast

The CILEx Group three year forecast (Appendix 2) shows the 2017 budget in the context of achieving a balance between the cost of regulatory and permitted purposes activity and income by 2019. This is achieved whilst maintaining the PCF at £364 over the three year period. This approach avoids further increases to the PCF until, in year three, the costs of regulation are fully met by income.

In terms of expenditure, CILEx is committed to achieving further efficiencies to reduce costs in real terms over the three year period. This will contribute to the reduction in spend on permitted purposes, as well as the other activities carried out by CILEx. This follows on from cost reductions already achieved in 2015-2016. CILEx is investing in technology that will reduce the amount of time spent on manual processing.

The further efficiencies and benefits from the investment in technology are not yet fully quantified, and some of the projects will not be completed until year two and three of the forecast period. This makes it difficult to anticipate the full impact on the Group and therefore on the PCF. However, it is the intention that these benefits will be passed on to the regulated community and the membership.

In the meanwhile, holding the PCF at £364 over the forecast period is in effect, a reduction in real terms.

4 REGULATORY FUNCTION

CILEx Regulation sets its budgets independently. CILEx Regulation Board determined its resource requirements for 2017 by considering the projected budget against its strategic aims. The budgets were considered at the CILEx Regulation Board meetings on 22 March and 7 April 2016. The budget was thereafter incorporated into the CILEx Group budget.

Appendix 1 shows how PCF income is spent on regulatory activities, including CILEx Regulation.

5 RESERVES AND CONTINGENCY

CILEx Regulation holds no reserves. The CILEx Reserves Policy provides that it should hold at least 12 months' budgeted PCF and membership income in reserve.

Protocols between CILEx Regulation and CILEx provide that CILEx will meet reasonable funding requirements of CILEx Regulation, including exceptional costs – e.g. in relation to staffing or legal claims, or new regulatory developments.

CILEx reserves currently stand at £5.7m (2.5 times the level of PCF income in the 2017 budget). Although those reserves are available to the CILEx Group as a whole and not just to CILEx Regulation, CILEx Regulation is confident that resources are available should they be required. There has been no change to Reserves Policy.

As will be seen from the analysis of regulatory and permitted purposes costs in Appendix 1, the fees budgeted for 2017 are intended to delivering a balanced budget.

PCF and permitted purposes fees will not increase Group reserves.

6 REGULATORY AND DIVERSITY IMPACT ASSESSMENT

The CILEx Group has a Single Equality and Diversity Scheme and Action Plan¹. The CILEx Group actively promotes equality against the required protected characteristics. The CILEx Group has due regard to advancing equality of opportunity when taking action to achieve its objectives. It identifies potential impact on various

¹ The CILEx Group Equality and Diversity Action Plan 2016-2020 is available at http://www.cilex.org.uk/about_cilex/who_we_are/equality_and_diversity

groups within its membership through the consultation with Fellows, the CPS, regulated community and potential applicants.

7 REGULATORY OBJECTIVES AND BETTER REGULATORY PRINCIPLES

CILEx Regulation and CILEx are aware of the importance of ensuring that the PCF covers the budget for activities that support the regulatory objectives set out in the Legal Services Act 2007. CILEx Regulation and CILEx are satisfied that PCF income will be spent solely on regulatory activities and permitted purposes that aim to promote adherence to the regulatory objectives e.g. authorisation and supervision, supporting members on the modernised CPD scheme, entity regulation (as applicable) together with providing advice and support to members to be able to meet new requirements.

CILEx Regulation and CILEx acted in accordance with the principles of proportionality, accountability, consistency, transparency and targeting, in determining and developing the PCF for 2017.

Transparency and accountability have been ensured through the manner in which consultation has been carried out with each affected member, applicants and the CPS as described below.

Chartered Legal Executives are the voting members of the chartered body. They receive the CILEx Annual Report, incorporating annual audited accounts². They are invited to attend the Annual General Meeting and may raise issues there or in advance. No member who attended the AGM on 21 July 2016 raised concerns regarding the 2017 PCF proposals.

The process for determining the PCF has been targeted solely at the regulatory and permitted purposes. A proportionate approach, in line with CILEx original three year budget plans, has been taken to determining the activity and thereby budgetary needs.

8 NON-COMMERCIAL BODIES AND THE CONSUMER PANEL

Consultation on the PCF for Fellows did not include non-commercial bodies. CILEx member data shows that the proportion of Fellows providing non-commercial legal services is not significant and not sufficiently relevant to this branch of the profession to warrant consultation with charities.

9 CHARTERED LEGAL EXECUTIVES

9.1 Consultation options

CILEx Council considered an outline draft budget and business plan in May 2016 and agreed proposals for consulting with Fellows on the following options:

- £372 – full cost of regulatory and permitted purposes activities;

² The Annual Report and Accounts are available at:
http://www.cilex.org.uk/about_cilex/business-plan/annual-report

- £365 – a move towards recovering the full cost of regulation and permitted purposes:
- £355 – no change.

CILEx Regulation agreed that the views of Fellows be sought on these alternatives.

9.2 Consultation process

The consultation period ran from 8 June to 12 July 2016. The consultation (Appendix 3) was emailed to 6,584 practising Fellows inviting responses online. The consultation was posted to a further 92 practising Fellows with no e-mail address registered with CILEx. A further 64 Fellows from the email group were also later surveyed by post as their email returned the e-survey undeliverable.

The consultation letter demonstrates how the options were arrived at and how the income derived from the PCF is spent across regulated activities and permitted purposes.

9.3 Outcomes

1,181 responses were received electronically. This represents an 8% increase against the 1,095 responses received in 2015 and builds on 78% growth in responses achieved last year.

1,172 respondents voted for one of the fee options. The votes were split as follows:

Fee option	Basis	Votes by no.	Votes by %age
£372	full cost of regulatory and permitted purposes activities	263	23%
£365	a move towards recovering the full cost of regulation and permitted purposes	296	25%
£355	no change	613	52%
	TOTAL	1,172	100.00%

543 respondents commented on the proposals, including four Fellows who commented but did not vote. The comments were wide ranging from support for the proposals to concerns in covering a higher cost.

9.4 Impact of reduction in LSB levy

During the consultation period CILEx was advised by the LSB on the revised levy figure. As the impact on the overall cost of regulation was substantial (£54k: equivalent to £8 per Fellow) it was considered important for this reduction to be taken into account.

In light of the reduced levy, the PCF could not be set any higher than £364, (i.e. £372 less £8). The deliberations were therefore confined to the following two options:

- keep the fee at £355 for a further year, or
- increase to £364.

The voting showed a small overall majority of 52% in favour of no change. However, it had been identified that keeping the fee at £355 would require additional savings to be identified beyond those already committed to within the budget. This was not considered achievable at the current time, having already undertaken a restructure and substantial programme of cost reduction. Therefore, on balance, it was concluded that it was important that the PCF be set at a level to recover the full cost of regulation and that the increase of £9 (+2.5%) to £364, was reasonable.

9.5 2017 proposals

The proposed PCF for Fellows is shown below. This was agreed by CILEx Council at its meeting on 21 July 2016 subject to approval:

PCF	2017	2016	Increase (£ & %)
Authorised Person (Fellow)	£364	£355	+£9 (+2.5%)

10 ASSOCIATE PROSECUTORS

10.1 Consultation options

CILEx Council in May 2016 agreed proposals for consulting with the CPS on the following options:

- £220.00 - a 25% increase representing a step towards full regulatory cost; or
- £276.32 - a 57% increase representing full regulatory cost.

There was no direct consultation with individual Associate Prosecutors as the CPS funds their PCF.

10.2 Consultation process

A Memorandum of Understanding between the CPS, CILEx Regulation and CILEx provides that practice fees will be agreed each year. The approach to the development of the proposals was communicated to the CPS at a meeting on 20 May 2016 with their Senior Court Business Advisor, Operations Directorate, and followed up in writing in June 2016 with background information regarding the basis on which the proposed fee options had been arrived at. It was explained that the PCF comprised three elements:

- regulatory costs - the direct cost of regulation being the net cost calculated in the 2017 CILEx Regulation working budget;
- permitted purposes; and
- levies set by the LSB and Office for Legal Complaints.

CILEx Regulation explained that CILEx had for current and previous years set the PCF below the full cost of regulation and permitted purposes. In effect, CILEx as the representative body and Approved Regulator subsidised the cost of regulation. The environment had changed and legal regulators were working towards financial independence, with no reliance on the Approved Regulator subsidising shortfalls in PCF income. As in previous consultations with the CPS, the proposals aimed to prevent an ever-widening gap between regulatory cost and income.

It was further explained that adjusted criteria would apply for the calculation, compared to those used for Fellows. CILEx accepted that taking an approach based on Associate Prosecutors as a proportion of authorised persons as a whole, in the main areas of activity affecting them (membership, corporate affairs and central services) would not give a fair reflection of the Associate Prosecutor-focused activity carried out by CILEx. Associate Prosecutors had proved to be a low regulatory risk.

For consistency CILEx used the same basis to calculate the cost of regulating Associate Prosecutors as for Fellows. Not all of CILEx permitted purposes applied. Hence separate permitted purpose calculations had been used. Permitted purposes included maintenance of the membership register, recording CPD, and dealing with payments were not applicable and were not taken into account in calculating the full regulatory cost.

Appendix 4 was shared with the CPS showing the figures used.

The number of Associate Prosecutors in CPS reduced from 253 in 2015 to 176 in 2016. On the basis of 253 Associate Prosecutors paying £176 in 2016, the total annual cost to the CPS was £44,528. On the basis of 176 Associate Prosecutors paying either £220 or £276.32 in 2017 the total annual fee would be £38,720 or £48,632 respectively.

10.3 Outcomes

The CPS objected on the basis that the level of regulatory work required in respect of Associate Prosecutors was facilitated by the CPS in a manner not possible for other regulated individuals, thus reducing the burden on CILEx Regulation.

CPS requested a special discounted rate, a freeze going forward or capping in accordance with the consumer price index. The initial CPS response was reported to the CILEx Regulation Board on 14 July 2016.

CILEx Regulation responded acknowledging that the proposed increase appeared high and confirming a wish to keep costs as competitive as possible. CILEx Regulation explained that when it commenced regulation of Associate Prosecutors, CILEx chose to subsidise the CPS despite it being a publicly funded organisation, in relation to the costs of membership and regulation for Associate Prosecutors. This subsidy had been financially viable for CILEx for the previous eight years. However, the Group now sought to work towards full cost recovery, with the figures proposed for 2017 proposed as a means of recalibrating the fees.

It was confirmed that although it was not possible to offer a special discounted rate, or to freeze or cap the fee, the calculations included an element of reduction for

permitted purposes activity to reflect Associate Prosecutor-focused activity carried out by CILEx, compared to that carried out for a CILEx Fellow.

CPS responded that they could not change their overall position for budgetary reasons but accepted that it is a matter for the regulator to set the fee taking into account their representations.

10.4 2017 Proposals

CILEx and CILEx Regulation considered the analysis provided to the CPS and their response. The CILEx Regulation Board expressed a preference to recover the full regulatory costs. CILEx Regulation acknowledges the element of supervision activity carried out by the CPS. CILEx Finance and Remuneration Standing Committee on 8 September 2016 considered the impact of a continuing subsidy for the Associate Prosecutor fee and accepted that the relatively small impact of phasing the increase to full regulatory cost over three years was acceptable in terms of balancing relations with the CPS. The fee for 2017 is therefore proposed as follows:

PCF	2017	2016	Increase (£ & %)
Associate Prosecutor	£220	£176	+£44 (+25%)

11 PRACTICE RIGHTS, ENTITY FEES AND COMPENSATION FUND CONTRIBUTIONS

11.1 Consultation options

CILEx Regulation led the setting the 2017 budget for regulatory costs for practice rights. Specifically it considered the supervision activities it carries out to identify its resource and budget needs.

Fellow with Practice Rights:

Fellows of CILEx pay an additional fee for each practice right on top of their PCF. The following consultation options for the 2017 practice rights top up fee were proposed:

- o £50 per practice right (no increase)
- o £55 per practice right (+10%)
- o £60 per practice right (+20%).

Non-Fellow grade of membership with Practice Rights:

It was recognised that the position of Graduates and other grades of CILEx member with practice rights is different to that of Fellows. This relates to probate and conveyancing practice rights, which are available to members in Graduate and other non-Fellow grades of CILEx membership, by means of a competence route.

These members have previously paid an annual subscription to CILEx but no practice fee. Therefore it was proposed that they pay a practice fee equivalent to the PCF paid by Fellows, as they become an authorised person.

It was proposed to consult on the same practice right fee options as for Fellows with practice rights above.

Non-members with Practice Rights:

An individual who is not a member of CILEx may apply for and gain probate or conveyancing practice rights. The difference between these individuals and CILEx members is that they do not gain the full benefit of the permitted purposes activities. Therefore it was proposed that these individuals pay only for those elements of permitted purposes that form part of shared services, in addition to the LSB levy and CILEx Regulation costs.

In addition they pay for services that CILEx Regulation provides which would otherwise be provided by CILEx and form part of the permitted purpose activity including administration of applications; financial management; certification; handling queries; and information transmission.

The following options for non-member practice fees were proposed:

- £450 per year (no increase) (top-up fee per practice right payable in addition);
- £495 per year (+10%) (top-up fee per practice right payable in addition);
- £540 per year (+20%) (top-up fee per practice right payable in addition).

11.2 Entity application and renewal fee:

The following options were proposed firstly for application/inspection, and secondly for annual renewal:

- no increase;
- 1.5% inflationary increase.

11.3 Amendment to entity fee structure

Current fee scales show £500,001 to £750,000 as the upper turnover bracket. CILEx Regulation consulted on revising the upper turnover bracket to £500,001 plus, in order better to align the fee structure with the existing compensation fund contribution scale.

11.4 Compensation Fund contributions

The following options were proposed for compensation fund fees:

- no increase;
- 1.5% inflationary increase.

11.5 Consultation process

Consultations on practice fees, entity fees and Compensation Fund contributions were combined, as the target group was the same. The consultation (Appendix 5) ran from 13 June to 12 July 2016. The consultation was featured in the CILEx Regulation e-shot on 14 June 2016 and a CILEx member e-shot on 30 June, and trailed on the CILEx Regulation website. It was emailed to 38 named practice rights holders and individuals in the application process, each of four regulated entities, two firms with pending applications for entity regulation and 27 members on the entity interest list, inviting response online.

11.6 Outcomes

A total of 17 responses were received (Appendix 6) with voting spread across the fee options. The responses were considered by CILEx Regulation Board at its meeting on 14 July 2016.

Responses included a request to charge practice rights top up fees per person rather than per practice right. The Board considered that there would be few applicants for more than one practice right so the suggestion that top up be paid per person was likely to have minimal impact on budget. On the other hand each practice right attracts its own supervision. For this reason it was agreed that practice rights continue to be charged per practice right, with a view to cost recovery.

Responses also included a request to introduce a fee band of £50k per annum turnover for small firms. Currently the lowest fee band is up to £100k. CILEx Regulation Board agreed retention of the existing fee band with a view to cost recovery, noting that it does not cost CILEx Regulation less to authorise and supervise firms with annual turnover of £50k and that to introduce a lower fee banding would be a loss leader.

11.7 2017 Proposals

- Fellow with practice rights: £60 per practice right (20% increase);
- Non-Fellow grade of membership with practice rights: £60 per practice right (20% increase);
- Non-member practice right: £450 per year (no increase) inclusive of one practice right (top-up fee per practice right payable in addition for a second or further practice right);
- Entity application and renewal fee: 1.5% increase;
- Entity fee scale amended to bring turnover brackets in line with Compensation Fund turnover brackets;
- Compensation Fund contributions: 1.5% increase.

Although it is appreciated that Compensation Fund contributions are not within the definition of permitted activities and so do not require approval under section 51, reference to them has been included here because consultation on the level of contribution for 2017 was combined with consultation on permitted activities.

It would assist if the LSB could consider treating this application as a request for an exempt direction under paragraph 3 of Schedule 4 to the Legal Services Act 2007.

Otherwise a separate request can be made for an exempt direction approving this contribution level.

Appendices:

Appendix 1: CILEx Group draft 2017 budget

Appendix 2: CILEx Group three year forecast

Appendix 3: Fellows 2017 PCF consultation

Appendix 4: CILEx 2017 draft Budget & PCF calculations for consultation with CPS on Associate Prosecutor fee

Appendix 5: Practice rights, entity and Compensation Fund contribution 2017 consultation

Appendix 6: Consultation response on practice rights, entity and Compensation Fund contribution 2017