To:	Board		
Date of Meeting:	27 April 2010	**Item:**	Paper (10) 29

Title:	Rule change applications – SRA Disciplinary Procedure Rules and IPS Code of Conduct
Workstream(s):	2d – Developing excellence in legal services regulation
Presented by:	Crispin Passmore, Strategy Director crispin.passmore@legalservicesboard.org.uk / 020 7271 0074
Author:	Rules Project Team chris.handford@legalservicesboard.org.uk / 020 7271 0074
Status:	Protect

Summary:

1. This paper invites the Board to consider and approve the following two applications:
   - The Solicitors Regulation Authority (**SRA**) application to approve new Disciplinary Procedure Rules
   - The ILEX Professional Standards (**IPS**) application to approve a new outcomes-based Code of Conduct.
2. Comprehensive issue logs for each application are maintained and are available on request.
3. Since the LSB assumed its full powers in January 2010, we have responsibility under Part 3 of Schedule 4 of Legal Services Act 2007 ('**the Act**') for approving applications made by an Approved Regulator (**AR**) wishing to make any alterations to its Regulatory Arrangements.
4. We have so far received six applications—four of which have been approved at Chief Executive level following advice of Board Members involved at working group level. The remaining two applications require full Board approval. This paper also provides an update on our experience of dealing with these applications both in terms of the conclusions reached and in developing robust internal processes.

Risks and mitigations	
Financial:	N/A
FoIA:	Decisions on rule change applications and connected documents are highly likely to attract FoI requests. All application documents and the final decision notice are published on the LSB web-site.
Legal:	There is some likelihood of challenge from The Law Society and also from individual aggrieved solicitors on the SRA Disciplinary arrangements as the key issue hangs on arguments of law. General Counsel is involved in the decision making process.
Reputational:	Rule change applications are a key regulatory interface with ARs and are well reported in the legal press. The SRA application in particular is likely to receive a high level of interest.
Resource:	High resource requirement, currently stable.

Consultation	Yes	No	Who / why?
Board Members:	✓		SRA application – BS and AW. IPS application – BS.
Consumer Panel:		✓	
Others:			

Recommendation(s):
The Board is invited to approve: 1) the SRA's "Disciplinary Procedure Rules" rule change application; and 2) the IPS' "Code of Conduct" rule change application and the draft Decision Notice at **Annex B**.

LEGAL SERVICES BOARD

To:	Board		
Date of Meeting:	27 April 2010	**Item:**	Paper (10) 29

SRA Disciplinary Procedure Rules and IPS Code of Conduct rule change applications

Executive Summary

The Board is invited to approve two rule change applications – SRA Disciplinary Procedure Rules and IPS Code of Conduct. Further information on the applications together with background on rule approval process and an update on applications received to date can be found in annexes at the back of this paper.

The main risk with regards to approving the IPS application is the regulatory capacity of IPS, particularly its preparedness to supervise and monitor against the new outcomes based code. However we consider that in the current regulatory environment, where Reserved Legal Activities are only undertaken by a relatively small number of Legal Executives the majority of which are also regulated by the SRA, the risks are low.[1]

The main risks with the SRA application hang on the standard of proof that the SRA would use in carrying out the new disciplinary powers that the proposed rules facilitate – the civil standard. It has been argued that case law requires that the criminal standard be applied to all solicitor disciplinary procedures and the last Master of the Rolls refused to agree the rules under the previous Ministry of Justice administered system because of this argument. Furthermore, the appellate function, through the independent Solicitors Disciplinary Tribunal (**SDT**), is likely to apply the criminal standard. The SRA has reassured us that it has taken reasonable steps in reaching the conclusion that its rules are legal and that there would be no insurmountable operational problem caused by the standard of proof for initial decisions and appeals not being aligned. Furthermore, the SRA has made a well researched, argued and rational argument for taking the principled approach to apply the Civil Standard of Proof in line with the majority of other professions. Therefore we recommend approval of the application.

LSB Approval Role

1. Part 3 of Schedule 4 of the Act provides for the LSB to consider applications from any AR wishing to make an alteration to its Regulatory Arrangements.
2. The Act allows the LSB to either approve an application (in full or in part), to refuse the application or to refuse to consider the application if it is deemed not complete. The onus is on us to approve the application – we can only refuse an

[1] IPS advised that as at 1 April 2010, there were 7,409 Fellows (under the Act only Fellows are authorised persons because they undertake the regulated activity of administering oaths). IPS estimates that no more than 200 Fellows would be working on their own account and not regulated by another AR (namely, the SRA or the CLC).

application (in part or in whole) if it meets one or more of the criteria that is listed in sub paragraph 25(3) of Schedule 4 of the Act.[2]

3. The LSB has also published supporting rules setting out our approach to the approval process and the manner in which ARs must submit their applications. The approach is to front-load the process by requiring the submission of well prepared and thought through applications.

4. It is not possible to judge definitively at the point of assessment whether the impact of the changes will have a positive or negative effect. Our role is therefore to assess whether the AR has followed due process by consulting widely, considering the evidence and researching potential impacts of the proposed changes before reaching what can reasonably be considered a rational conclusion. It is not our role to re-visit the research and make our own assessment of the evidence provided. However we must be satisfied that the conclusions reached have been well explained, both in the application and subsequent discussions, with the evidence being well referenced. We must be convinced that any policy position reached is reasonable in light of the evidence provided.

Applications for Board approval

5. The following sections of the paper will provide high-level discussion of the key issues and recommendations with respect to two rule change applications. More detailed information on the applications can be found in the issue logs which are available on request.

6. Further information on the process by which applications are considered and an update on previous applications can be found at **Annex A**.

SRA Disciplinary Procedure Rules

7. On 16 February 2010, we received the SRA application for approval of its Disciplinary Procedure Rules (2010). The proposed changes bring in rules which will enable the SRA to exercise new powers provided by the Act to give written rebukes and/or impose a penalty of up to £2000 where it is satisfied that there has been a breach of regulatory obligations or professional misconduct. Both powers can be exercised together and information may also be published. Decisions regarding publication will be made on a case by case basis, based on an assessment of the public interest. The publication criteria is set out within the submitted rules.

[2] The Board may refuse the application only if it is satisfied that – (a) granting the application would be prejudicial to the Regulatory Objectives, (b) granting the application would be contrary to any provision made by or by virtue of the Act or any other enactment or would result in any of the designation requirements ceasing to be satisfied in relation to the AR, (c) granting the application would be contrary to the public interest, (d) the alteration would enable the AR to authorise persons to carry on activities which are reserved legal activities in relation to which it is not a relevant AR, (e) the alteration would enable the AR to license persons under Part 5 to carry on activities which are reserved legal activities in relation to which it is not a licensing authority, or (f) the alteration has been or is likely to be made otherwise than in accordance with the procedures (whether statutory or otherwise) which apply in relation to the making of the alteration.

8. An application for approval of the rules was originally made under the previous system which required concurrence of the Master of the Rolls and the Lord Chancellor. Following intervention by The Law Society, this application was refused by the Master of the Rolls (and subsequently the Lord Chancellor) on the grounds of the burden of proof being applied, that is the civil standard of proof as opposed to the criminal standard which is applied by the SDT and which the SDT had indicated they felt bound to continue applying. The Master of the Rolls supported the view put forward by The Law Society and the SDT that case law requires that the criminal standard of proof be provided for lawyer disciplinary proceedings (and certainly for those cases which go in front of the SDT) and that therefore the SRA rules as submitted were not compliant with case law. (A case which was due to be heard and which would have provided an opportunity for the SRA to test its rather different reading of the law subsequently failed to address the issue). Although a number of potential issues have been discussed with the SRA as part of the approval process the standard of proof remains to be the key issue with the application and the only remaining area of real contention amongst consultees.

9. In policy terms the SRA has seemingly reached a fully justifiable conclusion that the civil standard is the right standard of proof for regulatory disciplinary proceedings on what are relatively minor matters. The Act provided the SRA with its new powers in order to expedite such less serious matters. We have been persuaded by the information submitted as part of the SRA's application which includes research by Capsticks LLP that demonstrates that the civil standard of proof is the prevalent standard applied across all other professions, including notably all the healthcare professions where there are a similar range of strong "striking off" penalties available in the event of significant failure. There appears little justifiable reason to treat the law differently.

10. The application also included a skeleton argument prepared by Tim Dutton QC. The argument puts forward the view that the standard of proof is not the subject of any statutory provision or procedural rule and has not been determined by the courts. Proceedings before a tribunal are civil and not criminal in nature, and the starting point should therefore be the civil standard. Furthermore, tribunal proceedings have a "protective regulatory function" which must balance the respondent's interests against the public interest – a balance which is correctly struck by the balance of probabilities required of the civil standard.

11. However, despite their best efforts, the SRA has been unable to obtain consensus and therefore suggested in its applications that it may be appropriate for the LSB to oversee discussions involving the SRA, the SDT and The Law Society about the standard of proof to be applied. To allow time for discussions to take place between all parties and for us to be informed of the extent and detail of these issues, we agreed with the SRA to issue an extension notice which would extend the end of the initial decision period to Friday 14 May 2010.

12. A meeting took place with representatives from the Law Society, SDT and SRA on 31 March 2010, chaired by the LSB. This meeting confirmed our view, and that expressed in the application, that the only contested issue remaining with this application is the civil standard of proof. The SRA consider that the civil standard with "heightened examination" (i.e. more intense scrutiny of the evidence rather than a higher burden of proof per se) in serious cases is compliant and therefore refute the view held by The Law Society, SDT (and

previously the Master of the Rolls) that the criminal standard must be applied in disciplinary proceedings against lawyers. It does not consider the SDT's suggestion that the rules be silent on the standard of proof being applied to be sufficiently transparent. Furthermore, the SRA has reiterated its principled position to apply the civil standard of proof in these rules, in accordance with what it considers to be the modern approach of other regulators and House of Lords rulings.

13. The SDT has confirmed that it would be unwilling to amend its rules to enable a different standard of proof to be applied to appeals, although it would of course need to respond to the final rules once approved. Therefore on this basis, if the rules are approved as is currently drafted, there would be a different standard of proof on appeal – where this is the power to increase the severity of disciplinary action as well as reach a different verdict on guilt. All parties consider that this may cause practical problems in the administration of disciplinary action and that an aligned standard of proof is desirable.

14. The SDT and SRA have discussed the introduction of a distinction between "regulatory breaches" and "professional misconduct/disciplinary offences" as a possible way around the issue which would allow for a different standard of proof for different types of offence. However, we consider that neither has made a convincing case for such a distinction and fail to see how this would be workable. It also seems to undermine what to us is a key principle: compliance with regulation is by its very nature one of the key characteristics that marks out a profession.

15. A note of the meeting, once agreed, will be published on our website alongside the application documentation.

16. It is now clear that an agreed approach between the SRA, SDT and The Law Society as to the standard of proof is unlikely. The question is therefore whether this issue provides sufficient grounds for us to refuse this application, given that we may only refuse where we can demonstrate that due process has not been followed or we are satisfied that the approval would fall within certain criteria (see paragraph 2 of this paper).

17. We consider that on the balance, the issue of the standard of proof does not compel us to refuse the application. The refusal criteria in the Act do not demark case law as an authority binding decisions on applications and the process by which we consider applications (as set out in the Act and our rules) does not require us to seek advice from the Master of the Rolls unless we issue a Warning Notice. The Act does provide us with a clear legal duty to promote the rule of law and therefore we cannot proceed with approval of this application if on the face of the record the rules are not legal. We have therefore sought and received further confirmation from the SRA it has reached its conclusion in full consideration of the opinion of the Master of the Rolls and that it believes that he may have drawn a different conclusion had he been in full possession of the facts (the application demonstrates that the opinion of the Master of the Rolls was given without having sight of SRA counsel's opinion). Following further discussion with the SRA we are content that the SRA Board has made its principled policy decision in its own right on the basis of a change in the law (as opposed to the legal context with which the Master of the Rolls previously gave his view), but we are awaiting final formal confirmation with regards to this point.

18. Furthermore, we have received sufficient assurance regarding our concerns that any practical implementation issues which arise from the SDT hearing appeals under a different standard of proof will be sufficiently resolved (as per the duty under section 54 of the Act which requires ARs to prevent or resolve any regulatory conflicts).

19. The SRA's application is in accordance with our process, setting out the intended nature and effect of the proposed rules and clearly demonstrating that decisions have been made with due consideration of evidence and consultation. We believe that the applicant, in consideration of all of the evidence, has come to a reasonable and rational conclusion. Subject to us receiving a satisfactory written response from the SRA (which we will publish on the website), we are recommending that the application be approved. We consider this approach to be fully in accordance with our approval process, particularly the emphasis on placing decision making responsibility firmly on the front line ARs. It is not our role to ensure that the conclusions reached are the ones that we would have made or that consensus is reached. Moreover, a lack of consensus does not invalidate an applicant's proposal or the process by which it is produced.

20. ***As we are in continuing discussions with the SRA, a Decision Notice for the SRA's application will be provided as a late submission to this paper in advance of the Board meeting.***

IPS Code of Conduct

21. On 26 February 2010, we received the IPS' Code of Conduct ('**Code**') rule change application. In summary, the application seeks to change the IPS' current rules-based Code to an outcomes-based Code. The new Code provides for the same arrangements as the existing Code but it is expressed differently – that is, in principles not rules.

22. The Act provides for Legal Executives to exercise the right of audience and the administration of oaths. A Legal Executive lawyer specialises in a particular area of law, and will have been trained to the same standard as a solicitor in that area. As a general rule, a Legal Executive lawyer is able to undertake all work that may be undertaken by a solicitor under the supervision of the solicitor. Those Legal Executives that work under the supervision of a solicitor are also bound by the SRA's code.

23. IPS advised that as at 1 April 2010, there were 21,555 members of which 7,409 were Fellows. Under the Act, only Fellows are authorised persons because they undertake the regulated activity of administering oaths. IPS estimates that most of its Fellows would be working in firms or departments regulated by the SRA or the Council for Licensed Conveyancers, and that there would only be about 200 ILEX members who would be working on their own account. Of the 200 or so Fellows, approximately 16 of them are immigration advisors who are authorised under the Act to work without supervision by solicitors. The remaining Fellows are undertaking unreserved legal activities, such as general legal advice and claims handling.

24. The initial 28-day decision period ended on 25 March 2010. Following agreement with IPS, we issued an Extension Notice to extend the decision

period to 7 May 2010. We have worked closely with IPS to improve our understanding of the application and to seek assurances on areas of concern.

25. The application provides a positive step towards outcomes-based regulation – fitting with the Better Regulation Principles. Overall, we are content that the process has been followed adequately, the conclusions that have been reached are rational, and approving the application would not meet the criteria set out in sub-paragraph 25(3) of Schedule 4 to the Act. As such, we recommend that the Board should approve the application.

26. However, we propose that approval should be subject to certain expectations and commitments being undertaken by IPS. These expectations and commitments are articulated in the draft Decision Notice. A key theme arising from the application is that although it is a positive sign that IPS is moving towards outcomes-based regulation, it will need to develop its regulatory capability. A move towards outcomes-based regulation not only requires adopting a principles-base code but also requires the AR to have regulatory infrastructure capable of identifying providers who are most at risk of failing to achieve the outcomes and taking strong supervision and/or enforcement action if they fail. It is this that makes the regulator outcomes-based rather than "light touch". IPS has not yet undertaken a robust analysis of the impacts the proposed changes will have on its own regulatory capability/capacity.

27. Although IPS has not fully considered its internal capability, we recommend that the Board approves this application for the following reasons:

    a. As there are approximately 7,400 Legal Executives that undertake reserved legal activity work, and most of them are regulated by another AR, we consider the risks associated with IPS not having such regulatory infrastructure, at this time, to be low.

    b. This application is a positive step towards outcomes-based regulation and ILEX/IPS is the first AR that has submitted an application to adopt outcomes-based regulation.

Future protection

28. Following discussions with IPS, it advised that when it submits its applications to extend its range of reserved legal activities and possibly to become a Licensing Authority, that those applications will include developing conduct and practice rules applicable to those areas of work and management of legal practices. As part of this, IPS is proposing that it will undertake proactive monitoring and inspection of practices to mitigate and address risks associated with those forms of practice. We would not approve future applications unless IPS can demonstrate that it has developed its regulatory infrastructure sufficiently to manage the increased risk presented by such expansion.

Regulatory conflict

29. The new Code will require members, who are also regulated by another organisation, to comply with those other codes, rules and regulations. The current Code also has this requirement. However, the application did not explain how any regulatory conflicts would be resolved.

30. IPS clarified that it considered its new Code to be the primary code for its members and that it may consider agreeing with other relevant regulatory organisations to harmonise their Regulatory Arrangements in the future.

Consultation process

31. Due to the small number of responses IPS received from its consultation process, IPS has agreed that it will disseminate the new Code as widely as possible, including disseminating the new Code to consumers by enlisting the help of other organisations (such as the Legal Ombudsman and consumer associations).

ANNEX A

Background, Process and Update on applications received to date

Background

1. Part 3 of Schedule 4 of the Act provides for the LSB to consider applications from any AR wishing to make an alteration to its Regulatory Arrangements.
2. The Act allows the LSB to either approve an application (in full or in part), to refuse the application or to refuse to consider the application if it is deemed not to be complete. The onus is on us to approve the application – we can only refuse an application (in part or in whole) if it meets one or more of the criteria that is listed in sub paragraph 25(3) of Schedule 4 of the Act.[3]
3. The LSB has also published supporting rules setting out our approach to the approval process and the manner in which ARs must submit their applications. The approach is to front-load the process by requiring the submission of well prepared and thought through applications.
4. We believe that it is the responsibility of the front-line regulator to determine what its Regulatory Arrangements should be. Although stakeholders may not agree with the AR's proposals, the absence of consensus does not invalidate the approach that was taken by the AR as long as it has followed the process that is set out in the rules and it has reached a logical conclusion.
5. Once we have decided whether to approve or refuse an application, we are required to publish a Decision Notice that states the reasons for our decision. The Decision Notice is a mechanism that allows us to identify key issues that were resolved with the AR, state any concerns that we have with the proposal, and any commitments which we have extracted during the approval process. An example is the inclusion of a requirement for the AR to monitor and evaluate whether the changes have resulted in risks materialising and/or the intended outcomes being achieved.

Process

6. Our early experiences have also allowed us to develop robust internal processes for assessing applications. The clock starts ticking the first full day following receipt of an application but the Act and our rules allow us to refuse to consider an application at any time if we consider it to be incomplete.

[3] The Board may refuse the application only if it is satisfied that – (a) granting the application would be prejudicial to the Regulatory Objectives, (b) granting the application would be contrary to any provision made by or by virtue of the Act or any other enactment or would result in any of the designation requirements ceasing to be satisfied in relation to the AR, (c) granting the application would be contrary to the public interest, (d) the alteration would enable the AR to authorise persons to carry on activities which are reserved legal activities in relation to which it is not a relevant AR, (e) the alteration would enable the AR to license persons under Part 5 to carry on activities which are reserved legal activities in relation to which it is not a licensing authority, or (f) the alteration has been or is likely to be made otherwise than in accordance with the procedures (whether statutory or otherwise) which apply in relation to the making of the alteration.

Our process is now as follows:

a. AR submits its application and receipt is acknowledged starting the initial 28-day decision period.

   The Act provides timelines that the LSB has to meet in determining whether to approve or refuse an application. The Act also provides for the LSB to issue or agree with the AR to extend the initial decision period (up to 90 days), or to issue a Warning Notice if the LSB is considering refusing the application (which will extend the initial decision period to anywhere between 12-18 months).

   Our rules state that we will aim to consider applications that are simple alterations within 28 days, and more complex applications within 90 days.

b. Project Team checks whether it is a complete application, and determines which Board Member(s) should be involved at a working level.

c. Project Team convenes an internal meeting to discuss and raise any issues with the application. Colleagues with particular knowledge and expertise are asked to provide input. An Issues Log is prepared following the meeting, which is then circulated to the nominated Board Members for their input.

d. Project Team arranges a meeting with the AR. The purpose of the meeting is to give them an overview of the process and to clarify any matters arising from the internal meeting. This may include requesting further information and/or seeking assurances from the AR on particular matters of concern.

e. Any additional information received from the AR is shared with the working level Board Members and is reflected in the Issues Log. If we are satisfied with the AR's responses, then a Decision Notice is prepared for approval by the Chief Executive or the Board.

f. An electronic copy of the Decision Notice is sent to the AR 24 hours before we publish it on our website and the formal hard copy is received by the representative and regulatory arms of the AR.

g. Following the Decision Notice being received by the AR, we may communicate separately to the AR regarding any other concerns that we may have with regard to the application. These concerns are those that would fall outside of our Part 3 to Schedule 4 of the Act jurisdiction. Depending on the issues, we may simply bring the issues to the AR's attention or require the AR to provide assurances or take certain actions.

7. We have also developed our first set of measures for approving changes to Regulatory Arrangements. These Key Performance Indicators (KPIs) have been published in the 2010/11 LSB Business Plan. They are as follows:

   - We will acknowledge rule change applications within two working days
   - When acknowledging an application we will provide a named contact for that application

- We will publish applications on our website within two working days of receipt so long as they are complete
- We will either make a decision on a case within 28 days or provide an explanation as to why we need longer
- We will publish our decisions on our website
- We will develop and publish KPIs for the processing of applications within certain timeframes by December 2010
- We will provide feedback to approved regulators on their applications in order to help them submit applications that can be dealt with rigorously and quickly.

Update on applications received to date

8. We have received a total of six applications so far – three from the Bar Standards Board (**BSB**), two from the SRA and one from IPS. We have now approved four of the six applications, two of which we processed and approved within the 28-day initial decision period, one within eight weeks of receiving the application and the other within seven weeks. This is notably quicker than the three-month turnaround target set out in the rules for processing any but the most simple of applications.
9. Approval of applications from the BSB includes changes to the Code of Conduct relating to Barristers and LDPs which allow Barristers to become managers or shareholders of LDPs and to practice in "dual capacity" as both a self-employed and employed barrister. Further changes relax current restrictions on the ways in which Barristers can practice including, sharing premises with non lawyers (subject to safeguards), conducting correspondence and taking witness statements, and attending to clients at police stations. Changes have also been made to expand the Public Access scheme to cover Immigration, Criminal and Family work. All of these changes have been introduced to immediate effect.
10. We have also approved changes to the SRA's Qualified Lawyers Transfer Scheme (**QLTS**) Regulations which seek to bring parity between the QLTS regulations (for applicants that want to practice in England and Wales) and the domestic qualification route, addressing current inconsistencies between the two sets of requirements. The SRA plans to introduce the new regulations from January 2011 and are currently completing the tender for a single assessment provider (which was run concurrently to submitting their application to us).
11. All information, including a Decision Notice for each application, has been published on our website to promote transparency and accountability.

    Immediate pipeline

12. We are expecting a fourth application from the BSB in the coming month for approval of changes to the Code of Conduct relating to the acceptance and return of instructions. A further application is also expected from IPS which relates to technical changes to ILEX advocacy rules which currently preclude ILEX members from becoming a partner of an LDP and continuing to do advocacy work (as the rules require that ILEX advocates are in the employment of solicitors).

Forward Plan update

13. We have now met and discussed the Forward Plan approach with all of the ARs. We are not expecting Forward Plans from the majority of the ARs this year, but are working closely with the BSB and SRA to develop plans to cover the remainder of this year. It is expected that this work will put us in good stead to develop plans for forthcoming years, to exempt certain applications from the approval process on the basis of Significance, Impact and Risk, and allow us to plan our resources over the year.

Lessons learned (what and when)

14. Our experience of processing these early applications has been varied, both in terms of the nature and impact of the changes and the quality of the application submitted. The level of engagement from ARs and capacity for a partnership approach has also varied with the different ARs.

15. There has been mutual acceptance on our own part and that of ARs that this is a new process for all and that a degree of pragmatism is needed. Whilst ensuring that our internal processes are sufficiently robust, we have maintained a degree of flexibility in enacting our processes. For example we have been pragmatic with regards to the quality of applications and also the extent to which this has been an iterative process.

16. We have committed to conducting a 'Lessons Learned' exercise after completion of the first six applications. This will involve an internal review of our processes and a series of short questions for ARs to feed back on how they found the process. We will also be meeting with the BSB during May.

17. The outcome of this exercise will be a report published on our website, and potentially subsequent changes to our rules for rule change applications (which will require further consultation). We anticipate that a further benefit of a full Lessons Learned review will be an increase in the quality of applications from ARs. We are working towards completing the Lessons Learned process in June.

18. In addition to Lessons Learned process, we have said in our Business Plan for 2010/11 that where appropriate we may use the information gained through rule approval to raise wider issues with the ARs which are outside of our approval role. Letters have already been sent from Chris Kenny (Chief Executive, LSB) to Mandie Lavin (Director, BSB) on the move to outcomes-based regulation following completion of the three BSB applications, and from Crispin Passmore (Strategy Director) to Antony Townsend (Chief Executive, SRA) on the matter of domestic qualification routes for solicitors following approval of the QLTS regulation

ANNEX B – DRAFT Decision Notice issued under Part 3 of Schedule 4 to the Legal Services Act 2007

Institute of Legal Executives Professional Standards Ltd's application for approval of amendments to its Code of Conduct

[REDACTED]