

BAR
STANDARDS
BOARD

REGULATING BARRISTERS

**Meeting of the Bar Standards Board
Thursday 27 March 2014, 4.30 pm
Room 1, First Floor, Bar Standards Board Offices,
289-293 High Holborn, London, WC1V 7HZ**

**Agenda
Part 1 – Public**

		Page
1. Welcome and introductions (4.30 pm)	Chair	
2. Apologies	Chair	
3. Members' interests and hospitality	Chair	
4. Approval of Part 1 (public) minutes:		
• 20 February 2014	Annex A	3-7
5. Matters Arising	Chair	
• Feedback about the Handbook – comments / queries from barristers	Ewen Macleod	
6. a) Action points and progress	Annex B	9-12
b) Forward agendas	Annex C	13
<u>Items for discussion</u>		
7. Governance Manual (4.40 pm)	BSB 019 (14)	Malcolm Cohen / Amanda Thompson
		15-30
<u>Items for noting</u>		
8. Supervision – Programme of activity for 2014/15 (5.05 pm)	BSB 020 (14)	Richard Thompson / Chris Nichols
		31-51
9. Chair's Report on Visits and Meetings: Feb 14 – Mar 14	BSB 021 (14)	Chair
		53-54
10. Director's Report (5.15 pm)	BSB 022 (14)	Vanessa Davies
		55-66
11. Any other business		
12. Dates of next meeting		
Wednesday 30 April 2014 (Away Day)		
Thursday 22 May 2014 (Board meeting)		

13. Private Session

John Picken, Board & Committees Officer

JPicken@barstandardsboard.org.uk

20 March 2014

<p>BAR STANDARDS BOARD</p>

REGULATING BARRISTERS

Part 1 - Public**Minutes of the Bar Standards Board meeting**

Thursday 20 February 2014, Room 1, First Floor

289 – 293 High Holborn, London, WC1V 7HZ

Present	Ruth Deech QC (Hon) (Chair) Rob Behrens Sarah Clarke Justine Davidge Simon Lofthouse QC Tim Robinson Richard Thompson
Attending by invitation	James Wakefield (COIC representative) Emily Windsor (Special Adviser) - items 7-14
BSB Executive in attendance	Andrew Cohen (Business Support Officer) Vanessa Davies (Director) Joanne Dixon (Qualification Regulations Manager) Sara Down (Head of Professional Conduct) Eugene Grant (Communications & Press Officer) Oliver Hanmer (Head of Supervision) Ewen Macleod (Head of Regulatory Policy) John Picken (Board & Committees Officer) Simon Thornton-Wood (Head of Education & Training)
Bar Council Executive in attendance	Stephen Crowne (Chief Executive, Bar Council)
Press	Catherine Baksi (Law Society Gazette)

ACTION**Item 1 – Welcome and introductions**

1. The Chair welcomed members and guests to the meeting.

Item 2 – Apologies

2.
 - Rolande Anderson
 - Malcolm Cohen
 - Patricia Robertson QC
 - Andrew Sanders
 - Sam Stein QC
 - Anne Wright
 - Sarah Brown (special adviser)
 - Matthew Nicklin QC (special adviser)
 - Nicholas Lavender QC (Bar Council Chairman)
 - Alistair Macdonald QC (Bar Council Vice Chairman)
 - Jessica Bradford (Senior Policy Officer, E&D)
 - Ben Denison (Chief Information Officer)

- Viki Calais (Business Manager)
- Roger Hammond (Change Programme Manager)
- Sarah Loutfi (E&D Adviser)
- Amanda Thompson (Head of Strategy & Communications)

Item 3 – Members’ interests and hospitality

3. None.

Item 4 – Approval of Part 1 (public) minutes – 23 January 2014 (Annex A)

4. The Board approved Part 1 of the minutes of the meeting held on Thursday 23 January 2014.

Item 5 – Matters arising

5. None.

Item 6 – Action Points & Forward Agendas

6. Action points and progress (Annex B)

The Board noted the updates to the action list as set out in Annex B.

7. Forward agendas (Annex C)

The Board noted the forward agenda list and agreed to include a further item in the March agenda about feedback about the Handbook. This arises from an earlier request from the Chair to the Regulatory Policy Team that comment and queries from barristers on the new Handbook should be tracked for any themes or patterns that might emerge.

**JP to
note**

Item 7 – Performance Report Q3 (as at 31 December 2013)

BSB 009 (14)

8. The Board considered the Q3 performance report. The salient points were:
- the income and expenditure variations were incorrectly stated in the original report. Amended figures were circulated to Members prior to the meeting and the public version of the papers will be corrected accordingly;
 - QASA remains a cause for concern. The delay to the start of the scheme has detrimentally affected projected income streams, though, conversely expenditure has been less than anticipated;
 - progress on entity regulation might stall further depending on the time required for s69 order to come into effect. This order may be helpful in confirming the BSB’s disciplinary powers over entities. The budget for entity regulation is also overspent primarily because of increased spending on legal fees;
 - development of an evidence base is highlighted amber. This is because a post in the Research Team remains vacant at present and could have knock-on effects for delivery times;
 - the PRP Committee asked that the following items be brought to the Board’s attention;
 - ❖ the drop in performance against KPIs in the Professional Conduct Team during Q3;
 - ❖ the high staff turnover figures (27%).
9. Vanessa Davies also reported a comment from Sarah Brown about the date quoted for designation as a Licensing Authority. This should be stated as the end of June 2014 instead of March. This is because the licensing authority application is a separate process and dependent upon the LSB approving the entity regulation application.

**AC to
note**

10. Members commented as follows:
- the reasons given in the report for the drop in PCD performance need fuller explanation;
 - sickness figures are already above target with one quarter remaining. It would be useful to:
 - ❖ separate out long term sickness figures; and
 - ❖ analyse the pattern of short term sickness;
 - it would be useful to receive an update on appeals against decisions made by disciplinary tribunals that were incorrectly constituted by COIC.
11. In response, the following comments were made:
- the lack of management reports meant that PCD staff were not always aware of impending KPI deadlines. It occurred at a time when there was a switch in databases and the staff member responsible for performance reporting was on long term sick leave. These circumstances are unlikely to recur;
 - the BSB is a small organisation with limited career opportunities for its staff though the range of skills a staff member develops can make them attractive to other employers;
 - most of the turnover has occurred at junior levels within the organisation and four of the eleven posts in question were as a result of voluntary redundancy;
 - exit interviews are conducted and senior management is made aware if any particular issues come to light;
 - weekly monitoring procedures are already in place which includes staff sickness rates and these processes are due to be reviewed further by the Head of HR;
 - to date the courts have found in favour of the BSB as regards the COIC cases. Four individuals are seeking permission from the Court of Appeal to appeal their cases. Negotiations on cost recovery from COIC are continuing.
12. **AGREED**
- a) to note the performance summary.
 - b) to separate out long and short term sickness totals for future performance reports.

**AC to
note**

Item 8 – Board Delegation of the Authorisation to Conduct Litigation

BSB 010 (14)

13. The Board considered a paper concerning a request from the Qualifications Committee to delegate decisions on authorisation to conduct litigation to staff members. The salient points were:
- formal delegation of powers to staff is needed so that applications from barristers to conduct litigation can be processed outside meetings of the Qualifications Committee;
 - the Board has previously delegated powers to the executive for similar work covered by the Terms of Reference of the Professional Conduct Committee. This proposal reflects that practice and accords with the previous decision of the Qualifications Committee, endorsed by the Board, to delegate more of its work to staff.
14. The following comments were made:
- the recommendation is for delegation to apply to a range of staff members through to Training and Regulation Officer level. It is unusual for the most junior members of staff to have the same level of delegation as more senior members;

Part 1 - Public

- there needs to be a clear audit trail to demonstrate staff members are acting within the powers delegated to them;
 - Sarah Brown has suggested that delegation be limited to the Director. This means the line of authority will run through that post making the Director responsible for how the powers are used even when decisions are taken by others.
15. In response, the following comments were made:
- the staff in the Qualifications Team are fully trained and will make decisions in line with previously published criteria already available on the website. The Qualifications Committee retains a right of review of those decisions;
 - in terms of audit, a list of all authorities delegated to staff will be maintained (similar to the process already in place in the Professional Conduct Department);
 - as an interim measure, the Board may wish to delegate authority just to the Director pending approval of a fuller scheme of delegation.
16. **AGREED**
- a) to delegate authority to approve the conduct of litigation to the Director with immediate effect.
 - b) that these powers be applied in line with the guidance given on the criteria for decision making as published on the BSB website.
 - c) to ask that details of delegation to approve the conduct of litigation across the various staff grades be presented to the March Board meeting, along with the full Scheme of Delegations item due to be discussed at that time.

JD / VLD
to note
VLD to
note
JD

Item 9 – Education & Training: Annual Report for 2013

BSB 011 (14)

17. The Board considered the 2013 Annual Report from the Education & Training Committee. Simon Thornton-Wood referred to paragraph 42 concerning data on pupillage numbers. The report is currently incomplete in this respect but a final, agreed figure will be incorporated in the published version. This is likely to show an uplift in the numbers of pupillages previously indicated.
18. The following comments were made:
- Justine Davidge needs to be included in the membership list for the Committee;
 - there is a marked upward trend in the numbers of overseas candidates taking the Bar Transfer Test (BTT) but it is unclear what is driving this forward or what are the pass rates.
19. Joanne Dixon advised that the increase in BTT numbers specifically concerns candidates from Bangladesh. Applications are being co-ordinated by a training organisation in that country, of which the Board is already aware. Whilst most of the candidates wish to practise in their own jurisdiction, they are using the BTT route to gain an appropriate qualification, though the pass rates are generally low.
20. **AGREED**
- a) to note the content of the 2013 Annual Report from the Education & Training Committee.
 - b) that the membership list be corrected and figures on pupillage numbers be included prior to publication.

STW

Item 10 – Chair’s Report on Visits and Meetings: Jan 14 – Feb 14

BSB 012 (14)

21. The Chair referred to her report on visits and meetings. Her discussion on 13 February with David Edmonds, Chair of the LSB, focused on the issue of lay Chairs and ethics.
22. **AGREED**
to note the report.

Item 11 – Director’s Report

BSB 013 (14)

23. Vanessa Davies highlighted the following:
- the meeting of the International Legal Regulators’ workshop, referred to in paragraph 2 of the report, will take place on 8-9 July 2014;
 - the Supervision Committee met for the first time on 18 February 2014;
 - the Bar Barometer will now be published one week later than anticipated (w/c 24 February 2014);
 - the authorisation to practise renewals are underway. There were problems early on about access to the Barrister Connect site but these have since been resolved. So far one third of barristers have renewed their certificates and the Records Team is up to date with enquiries.
24. **AGREED**
to note the report.

Item 12 – Any Other Business

25. None

Item 13 – Dates of next meeting

26. Thursday 27 March 2014.

Item 14 – Private Session

27. The following motion, proposed by the Chair and duly seconded, was agreed:

That the BSB will go into private session to consider the next items of business:

- (1) Approval of Part 2 (private) minutes – 23 January 2014;
 - (2) Matters Arising;
 - (3) Action points and progress – Part 2;
 - (4) Corporate Risk Register;
 - (5) Business Plan 2014-15;
 - (6) QASA Update;
 - (7) Prosecution Panel remuneration – update paper;
 - (8) Note on appointment of Chair in succession to Baroness Deech QC (Hon) Jan 2015 and appointment of Board members for 2014 and 15 (*post meeting note – discussion on this item was subsequently deferred*);
 - (9) Any other private business.
28. Neither the Bar Council nor COIC was invited to attend the private session. The meeting finished at 5.15 pm.

BSB – List of Part 1 Actions
27 March 2014

(This includes a summary of all actions from the previous meetings)

Min ref	Action required	Person(s) responsible	Date of action required	Progress report	
				Date	Summary of update
16c (20 Feb 14)	provide details of delegation to approve the conduct of litigation across the various staff grades with the full Scheme of Delegation for approval at the March meeting	Joanne Dixon	prior to 20 March 2014	19 /03/14	Completed – items on 27 March agenda
20b (20 Feb 14)	publish the E&T Annual Report 2013 subject to correction of the Committee membership list and inclusion of figures on pupillage numbers	Simon Thornton-Wood	prior to 27 March 2014	17/03/14	Data on pupillage still being validated prior to publication but anticipated by date of Board meeting
12c (21 Nov 13)	undertake a further review to the Standing Orders	Amanda Thompson / Chloe Dickinson	by end Sep 2014	11/02/14 14/01/14	Consideration to some principles to be given at April Awayday Work has commenced
16 (24 Oct 13)	continue with implementation of the regulatory risk framework as agreed by the Board	Amanda Thompson	before April 2014	11/03/14 11/02/14 14/01/14 13/11/13	Delays in recruitment mean first review will now be brought to June meeting. By the Board meeting training will have taken place for staff – first specialist session delivered on 13 March. First review to be brought to Board in March Discussed at Awayday in December; to be reviewed by SMT week of 20 Jan 2014 and by Board in February In progress. Updates in Director's report, performance report and corporate risk register. Key action for Board to note is need to schedule training dates for Board members in December.

BSB – List of Part 1 Actions
27 March 2014

(This includes a summary of all actions from the previous meetings)

Min ref	Action required	Person(s) responsible	Date of action required	Progress report	
				Date	Summary of update
14b (26 Sept 13)	implement the action plan arising from the Diversity Review of the Bar Standards Board Complaints System	Sarah Loutfi / Sara Down / Amanda Thompson	before end March 14 (action relating to online training due by start of 2015)	19/03/14	Completed (training opportunities for committee members will extend until 30 April.)
				07/02/14	On track
				14/01/14	On track
				13/11/13	Work remains on track
				16/10/13	In progress. The majority of actions have been completed or are on track. Two items (user feedback survey and inclusion of EIAs in policy work) are being addressed but may be implemented early next year rather than before the end of 2013.
24b / c (26 Sept 13)	extend amendments to the new Fitness to Practise Regulations and Guidance to cover the manager of the entity (irrespective of whether this person is a BSB authorised individual) and forward the application to the LSB for approval	Ewen Macleod / Sara Down	by 28 October 13	19/03/14	Incorporated into entity regulation application
				12/02/14	Ongoing – to be discussed at Handbook Working Group meeting w/c 24 February 2014
				11/11/13	Discussions ongoing with the LSB in relation to the draft entity application

**BSB – List of Part 1 Actions
27 March 2014**

(This includes a summary of all actions from the previous meetings)

Min ref	Action required	Person(s) responsible	Date of action required	Progress report	
				Date	Summary of update
16b (18 Jul 13)	gather feedback on accessibility of information on the BSB website about complaints	Amanda Thompson	before end March 14	11/03/14	Feedback will be sought at stakeholder session on 28 March.
				14/01/14	On track
				13/11/13	Stakeholder workshop held on 13 November dealing with QASA. Next session will be as below. Early indications are that engagement will be productive.
				17/07/13	Stakeholder workshop/seminar being planned to deal with communicating the work of PCD. Anticipate will be held before end of March 2014 but depends on stakeholder availability. Date will be confirmed when available.
12d (21 Jun 12)	update the draft Governance Handbook re: typographical and text amendments and re-draft of the section concerning Gifts and Hospitality	Viki Calais	August 2012	19/03/14	Completed – on March Board agenda for sign off
				11/02/14	Final version expected to be signed off at March Board
				14/01/14	Gifts and Hospitality completed; major revision of governance handbook now complete and being reviewed by GRA
				5 Nov 13	Revised approach adopted by GRA, the next version will be presented to the January 2014 GRA meeting

BSB – List of Part 1 Actions
27 March 2014

(This includes a summary of all actions from the previous meetings)

Min ref	Action required	Person(s) responsible	Date of action required	Progress report	
				Date	Summary of update
20a (16 Jun 11)	arrange for amended Memorandum of Understanding to be signed for BSB User Group and ensure disclosure of interests by members of the Group	Amanda Thompson	before 13 July 2011	14/01/14	Expected to be finalised at March 28 stakeholder group meeting
				13/11/13	To be progressed with stakeholder group following analysis of feedback received from first session held on 13 November.
				8 Oct 13	as below
				9 May 13	To be progressed as part of overall stakeholder engagement strategy
				13 Mar 13	To be progressed now new staff in post
				12 Jul 12	Ongoing

Forward Agendas

Wednesday 30 April 2014 (Board Away Day)

- Bar Council long term planning
- Outcome of MoJ regulatory review
- Governance improvements
- Board development

Thursday 22 May 2014

- BSB Year-End Performance Report (includes Business Plan update, KPIs, Management Accounts, Corporate Risk Register)
- Jeffery Review of Advocacy report (if available)
- Public Defender Service (PDS) – comments on the code of conduct for its advocates
- BSB Equality Objectives 2014-15

Thursday 26 June 2014

- Fees and Charges
- Equality and Diversity Chambers Monitoring report
- Regulatory Risks

Thursday 24 July 2014

- BSB Draft Annual Report for 2013-14
- TRIP closure report

Thursday 11 September 2014 (Budget meeting)

- BSB draft Business Plan and Budget Bid for 2015-16

Thursday 18 September 2014

- BSB Q1 Performance Report (includes Business Plan update, KPIs, Management Accounts, Corporate Risk Register)
- PCD/PCC Annual Report
- Interim assessment against Regulatory Standards Framework

Thursday 23 October 2014

- Forward strategic overview

Thursday 27 November 2014

- BSB Q2 Performance Report (includes Business Plan update, KPIs, Management Accounts, Corporate Risk Register)

Thursday 11 December 2014 (Board Away Day)

Thursday 29 January 2015

Thursday 26 February 2015

- BSB Business Plan for 2015-16
- BSB Q3 Performance Report (includes Business Plan update, KPIs, Management Accounts, Corporate Risk Register)

Thursday 26 March 2015

Governance Manual

Status

1. For approval.

Executive Summary

2. The Governance Risk and Audit Committee present the first draft of the Governance Manual.
3. It is principles-based and outcomes-focussed, and lists the roles and responsibilities of Board and committee members. Achieving a shared understanding of the way the organisation is run and agreeing to common standards and expectations across the Board and committee members strengthens the capability and capacity required, at strategic level, to support the requirements of the regulatory standards framework (RSF).
4. The Governance Manual is seen as a communication and risk management tool to ensure a consistently high level of understanding across the Board, committees, sub-committees, advisors and management team, of how the organisation operates, and why, to achieve its vision and mission.

Recommendations

5. The Board are asked to
 - a. **Consider and approve** the Governance Manual
 - b. **Note** the supporting work being undertaken to help embed the Manual and the links between the Manual, the Scheme of Delegations and the upcoming Standing Orders review.

Comment

6. The Manual has been designed to suit the outcomes focussed approach to regulation. It provides a view of the governance and management of the BSB including the roles and responsibilities of the members of the Board and committees entrusted to oversee the organisation.
7. It has been shaped by the vision and mission of the organisation, and gives an account of how the Board envisages achieving the regulatory and corporate objectives according to the strategic plan. In this way it is flexible, and should be amended to suit the approach of the Board, but remains anchored to overarching principles. It includes best business practice and risk management techniques such as policies and accounting controls.
8. It is important that the Manual is embedded into the work the BSB does at all levels where it has a bearing on the approach, the design or the controls developed for strategic and operational processes. The Manual signposts to key frameworks that shape the BSB's work, for example the Regulatory Risk Framework, and the RSF.
9. To support the embedding of the Governance Manual, several linked activities are being undertaken:
 - a. A small review of the presentation of governance information on the BSB website to increase usability and transparency is being planned.
 - b. Board and committee member induction materials are being prepared, as well as a review of formal induction processes with the HR Manager.
 - c. The Board agreed another more detailed review of the Standing Orders would be necessary to ensure an appropriate governance system is in place to support well-

controlled delegated decision-making at a level which empowers the executive, promotes value for money, ensures consistency and timeliness and the best strategic use of expert committees. This is being coordinated by the GRA Committee and will be informed by the Board Awayday.

Resource implications

10. This decision has no additional financial or resource requirements arising from the development or implementation of this Manual.

Equality Analysis

11. The Governance Manual has been assessed for its equality impacts, and the E+D outcomes have been developed with the E+D team to reflect the priorities and approach to equality taken by the Board.

Risk implications

12. There is a risk that although much of this knowledge is understood implicitly throughout the Board, the lack of a written Governance document pitched at this level leaves a gap in the organisation's shared knowledge. It is important for all members to have a consistent understanding of the governance principles at the BSB, especially considering the varied nature of members' involvement and purposes of the groups. Relying on detailed process guidance and meeting papers risks losing a strategic-level view of the approach and vision of the whole organisation.
13. There is a risk that by not developing and publishing an account of the approach to governance, the BSB could be criticised by the public and profession for being opaque when the BSB strives for openness and transparency.

Consultation

14. The Manual has undertaken several iterations directed by the Governance, Risk and Audit Committee. It has also undergone consultation with the Chair of the BSB, the Director of the BSB and the Senior Management Team.

Publicity

15. The Governance Manual will be published on the website in due course. This decision will feature in Part 1 of the public papers.

Annex

16. Annex 1: Governance Manual

Lead responsibility:

Amanda Thompson, Head of Strategy and Communications
Chloe Dickinson, Governance Support Officer



Governance Manual

Contents

1. Introduction	3
2. Effective Delegation.....	5
3. Transparent, Fair and Effective Business.....	7
4. Planning, Performance and Finance.....	9
5. Risk Management.....	12
6. Equality and Diversity.....	14

Foreword

I am pleased to introduce the Bar Standards Board's first Governance Manual, which underpins the organisation's values and principles and sets out how we will continue to strengthen our governance structure and framework. It is intended that Board, committee and staff members use this as a best practice document, and that it is used to introduce new members to the practices of the organisation along with the induction materials setting out the role and responsibilities of Board and committee members and key information they need to effectively carry out their important role at the BSB.

The first edition of the Manual is published at a time when the world of legal regulation is rapidly changing and we are faced with risks and challenges where a robust governance framework is needed to address these issues. We already have in place excellent governance practices however these are strengthened by bringing them together in one publication and communicating them both internally and externally.

The Bar Standards Board will strive to adhere to the procedures set out in this Manual, which will benefit the organisation in being more accountable, making better decisions and helping to achieve value for money.

Baroness Deech QC (Hon)
Chair of the Bar Standards Board
Month 2014

1. Introduction

Why do we need this manual?

- 1.1. The Manual is intended to help members of the Board, committees and staff understand the organisation and apply principles of good governance.
- 1.2. The BSB's governance structures are underpinned by the BSB's Constitution and the BSB's Standing Orders as well as relevant legislation such as the Legal Services Act 2007. This Manual supplements these two documents and also contains information about supporting policies and working practices, and links to key information stored elsewhere.
- 1.3. By embedding good governance, we will encourage the trust of the public and the profession. Effective governance incorporates good management, performance, stewardship of funds and public engagement to ultimately create good outcomes.

The Board's role in ensuring internal controls

- 1.4. The structure and systems in place at the Bar Council and within the BSB are critical to delivering efficient and focussed regulation which is mindful of the better regulation principles¹ that formed the basis of the Regulator's Code.² The guidance in this manual helps to ensure that the Board is engaged, well-informed and supported, which in turn helps it to take effective strategic decisions and give direction to the executive. The robust internal controls in place support the delivery of the strategy by an expert executive team, as well as ensuring independence from representative influence to ensure regulation of the profession in accordance with the statutory regulatory objectives, which are largely focused on the public interest
- 1.5. Internal controls are systems that an organisation puts in place to help it meet business objectives, make good decisions, maximise its resources and comply with its obligations.
- 1.6. The BSB's controls are subject to regular evaluation – both internal and external - to provide assurance that they mitigate risks appropriately as changes occur. One of the Board's roles is to seek assurance that the control systems and policies are adequate and being complied with in order to mitigate the risks we face.

1

<http://webarchive.nationalarchives.gov.uk/20100407162704/http://archive.cabinetoffice.gov.uk/brc/upload/assets/www.brc.gov.uk/principlesleaflet.pdf>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/262915/13-1016-regulators-code.pdf

How does the Governance Manual fit with other governance documents?

1.7. The suite of corporate governance documents at the BSB comprises:

- A Constitution – created by the Bar Council to satisfy the requirements of the Legal Services Act 2007, which includes regulatory objectives, the required make-up and proceedings of the BSB Board;
- The Standing Orders – created by the BSB to document how it will fulfil its obligations within the Constitution. It includes details of the committee structure;
- This Governance Manual – created by the BSB to describe the principles of good governance it has adopted and the internal controls in place;
- A Strategic Plan – created by the BSB, to document and communicate the mission, vision, values, and objectives that will drive the activities during the period;
- A number of policies and procedures – created by the BSB, and where appropriate some further organisation-wide policies created by the Bar Council but adopted by the BSB, to implement legislation, risk management and best practice in internal operations;

1.8 The control systems are designed to produce the following:

Effective delegation:

- The Board, committees and executive have clear delegated responsibilities and understand the extent and limits to their authority (2a);

Transparency, fairness and effectiveness

- The independence and integrity of the Board, its individual members and all decisions are maintained and seen to be maintained (3a);
- Meetings are effective and efficient, with constructive and informed input from all members ensuring issues are thoroughly considered to support good decision-making (3b);

Planning, performance and finance

- The BSB focusses on achieving its regulatory objectives (4a);
- The BSB has the resources reasonably required to undertake its regulatory activities (4b);
- The BSB understands and manages its resources well (4c);
- The BSB demonstrates its work is good value for money (4d);

Risk management

- Regulatory risks are understood and acted on to mitigate the impact on the market and improve regulation in the public interest (5a);
- Corporate risks are understood and well managed to mitigate the impact on the BSB's operational efficacy as well as to safeguard its assets (5b);

Equality and diversity

- The work of the BSB meets its obligations under the Equality Act 2010 (6a);
- The regulatory work of the BSB meets the objective of encouraging an independent, strong, diverse and effective legal profession, as set out at s.1(f) of the Legal Services Act 2007 (6b)
- In relation to equality and diversity the BSB may go further than pure legal and regulatory compliance and adopt a best practice approach where practicable and appropriate (6c).

2. Effective Delegation

Outcomes

2a The Board, committees and executive have clear delegated responsibilities and understand the extent and limit of their authority

Commentary

2.1 The BSB's Constitution sets out the powers delegated to it by the Bar Council. The Board is responsible for creating an organisational structure capable of meeting its regulatory obligations and implementing its strategic plan by establishing and maintaining a scheme of delegations. This scheme of delegations therefore describes the authority granted by the Board to its committees and executive to carry out functions on its behalf.

2.2 The Board uses effective delegation to help ensure that the organisation's resources are used efficiently and capacity is maximised at every level. Setting and abiding by a clear scheme of delegations also gives consistency in decision-making and gives transparency and accountability to the decision-making processes which can be scrutinised by stakeholders.

2.3 The BSB Board has taken three approaches to delegating functions to its committees and to others, in accordance with paragraph 50 of the Standing Orders. Firstly, the Board delegates specific areas of work to its committees using the Standing Orders. Secondly, the Board requires for some regulatory decision-making to be undertaken by the executive and other bodies, for example project boards. These powers are granted directly to roles using formal letters of authority. Thirdly by designing into the BSB Handbook the ability to exercise regulatory decision-making. This is true in the case of the Professional Conduct Committee which is able to authorise others, including the executive, to take decisions on its behalf according to controlled procedures.

2.4 The Board has delegated authority to the Director of the BSB for oversight of all operational and administrative activities. The Director may delegate these further without disposing of accountability for them.

2.5 All of these delegations and transfers of power are mapped out in a tabular scheme of delegations. Arrangements under this scheme will be reviewed at least every two years, or when there are significant changes in the structure, activities or responsibilities of the organisation.

Responsibilities

2ai The Board oversee decision-making structures and delegations, and retains accountability

2aii The scheme's underpinning documentation may only be created, altered or revoked by the Board. The scheme table must reflect the underpinning documentation.

2aiii The Board, committees and executive must abide by the scheme of delegations in all decision-making and in designing and implementing new structures, systems and policies within which decisions are made.

Guidance on scheme of delegations

2.6 The Board reserves certain activities to itself that may not be delegated. These are detailed in the Standing Orders and listed in the scheme of delegations.

2.7 For clarity and completeness, a note of key matters reserved to the Bar Council, as the employer and Approved Regulator under the LSA07 is listed here:

- Establishment of the Bar Standards Board and creation of its constitution;
- Establishment of an Appointments Panel to appoint members of the Bar Standards Board, under Schedule A, paragraph A1 of the BSB Constitution;
- Overall responsibility for the Bar Council's financial and risk management, including financial reporting, external audit and operational compliance, including the provision of insurances, tax, payroll, pension and investment arrangements;
- Compliance with statutory responsibilities relating to recruitment and employment, personal data protection, equality and diversity, health and safety;
- Approval of annual revenue and expenditure budgets, and financial expenditure approvals listed in the Finance manual;
- Approval of expenditure or virement between directorates of more than 10% of the BSB's annual budget (delegated to the Finance Committee - FC);
- Approval of organisation-wide accounting policies and financial management arrangements (delegated to FC);
- Determination of remuneration and terms of engagement for senior officers (delegated to Emoluments Committee);
- Preparation of financial statements;
- Approval of additional members of staff, and certain levels of unbudgeted expenditure and virement (delegated to FC).

3. Transparent, Fair and Effective Business

Outcomes

3a The independence and integrity of the Board, its individual members and all decisions are maintained and seen to be maintained

3b Meetings are effective and efficient, with constructive and informed input from all members ensuring issues are thoroughly considered to support good decision-making

Commentary

Independence and Integrity

3.1 Provisions within Part 5 of the Standing Orders and paragraphs 16 to 18 of the Constitution control the proceedings of BSB Board, its committees and work conducted outside of meetings to support transparency, accountability and openness in decision-making.

3.2 The main driver for these provisions is to ensure and evidence independence of regulatory decisions from representative interests. Other controls that must be followed include:

- the Policies on Gifts and Hospitality, and Declaration of Interests;
- a general principle of open publication of information, including public meeting proceedings and members' fees and interests;
- maintaining confidentiality of private Board business until it is discussed in public session, of which proceedings are published.

3.3 To ensure the executive supports regulatory independence as well as the Board and committees, a protocol³ has been drawn up to control how advice on regulatory policy may be appropriately informed by but not unduly influenced by representational interests. For example the representative arm of the Bar Council is a key stakeholder of the BSB, but the BSB's decisions and policy development must be undertaken independently. If the Bar Council could potentially present useful information about the regulated community or operation of the market that is necessary to inform regulatory activity, the protocol outlines how this will be requested by the BSB and how the Bar Council may request the facility to make representations on any matter to the BSB.

3.4 The BSB publishes the fees and expenses of its members annually on its website (see guidance box below). By publishing these figures the BSB remains accountable to its stakeholders and this also reduces the risk of improper use of resources.

3.5 The BSB publishes its income and expenditure in the Annual Reports, and the Bar Council, BSB and LSB publish the breakdown of the Practising Certificate Fee for full accountability and transparency to the profession and the public.

3.6 Decisions and recommendations made by the Board or committees are recorded and tracked by staff whose role it is to monitor the progress of their implementation.

Responsibilities

3ai Board and committee members have a responsibility to ensure they understand and abide by the structural and procedural controls in place to ensure independence from representational interests as well as other inappropriate internal and external influence;

3aii Board members must engage with BSB Board meetings as detailed in the Constitution and Standing Orders; committee proceedings must adhere to the procedures within the Standing Orders, and otherwise may create their own procedure. Further procedural rules are:

a) Members unable to attend a meeting can submit their comments on a matter to the Chair in advance of the meeting to be shared during discussion. A vote will not be counted in absentia. Members that are unable to attend a meeting in person may attend remotely. A vote will be counted from a member attending remotely.

b) Where a meeting of the Board starts or becomes inquorate, then decisions requiring a quorum will be adjourned to such a time as may be determined by the Board members present or the Chair.

c) A decision taken outside a Board meeting is only valid if:

- reasonable notice of the matter to be decided has been given to all Board members;
- it is subject to normal quorum and voting rules;
- the decision is recorded in a single written document signed by at least two-thirds of members (an email will be treated as a signed written document); and
- the decision is formally ratified at the next meeting so it appears in the minutes.

3bi Board and committee members must make decisions based on a full understanding of the issues, which requires ensuring they have all the necessary information from the executive, committees and other sources.

Guidance on Board and committee member payments

3.7 Information on the salaries, fees and expenses of the BSB Chair, Vice Chair, Board and committee members and any non-Board committee chairs is published on the BSB's website annually here

https://www.barstandardsboard.org.uk/media/1536960/bsb_board_expenses_final.pdf

Guidance to the proceedings of meetings. It is recommended that:

3.8 A matter may be agreed upon subject to small specified amends or actions to be carried out by a named individual or Committee. The Director carries responsibility for ensuring the completion of actions delegated to a member of the executive.

3.9 If a vote is required in the absence of clear consensus voting takes place by a show of hands unless the members agree that there should be a ballot. If a ballot is called for it must be a secret ballot and the minutes of the following meeting record the number of votes.

3.10 The minutes of the meeting will normally record only the numerical result of a vote, showing the numbers for and against the proposal and noting any abstentions. A member may require that their particular vote be recorded in the minutes.

Publication of proceedings and attendance

3.11 The Chair decides who may be invited to attend the private sessions of the BSB Board meetings, observing the Protocol between the Bar Council and BSB on regulatory independence as relevant. Committee chairs are also able to decide who is invited to attend their private meetings outside of membership. Chairs decide with whom the minutes will be shared.

3.12 The agenda, papers and proceedings of the public sessions of the BSB Board meetings are published on the BSBs website, usually within five working days of formal approval unless the Board decides otherwise.

Administration and Logistical Needs

3.13 In normal circumstances, meeting agenda and papers are circulated at least four working days in advance of the meeting. Draft minutes are usually circulated within eight working days.

3.14 The Board is administered by the Board and Committees Officer. Each committee has a secretary or support member from the executive listed on the website.

3.15 Should any member require to attend a meeting remotely, for example by teleconference or videolink, they can contact their committee secretary or the Board and Committees Officer.

4. Planning, performance and finance

Outcomes

4a The BSB focusses on achieving its regulatory objectives

4b The BSB has the resources reasonably required to undertake its regulatory activities

4c The BSB understands and manages its resources well

4d The BSB demonstrates its work is good value for money

Commentary

4.1 The regulatory objectives are set out in section 1 of the Legal Services Act. They are:

- a. protecting and promoting the public interest;
- b. supporting the constitutional principle of the rule of law;
- c. improving access to justice;
- d. protecting and promoting the interests of consumers;
- e. promoting competition in the provision of services within subsection (2);
- f. encouraging an independent, strong, diverse and effective legal profession;
- g. increasing public understanding of the citizen's legal rights and duties;
- h. promoting and maintaining adherence to the professional principles.

4.2 The Board is ultimately responsible for strategically planning the activities of the BSB, ensuring it is performing well and effectively managing its resources throughout the organisation. Thorough planning plays an important part in determining strategic direction and future development, and also helps to ensure the BSB provides good value for money.

4.3 The executive is tasked with operational planning and performance reporting which includes monitoring planned activities and spend against budget. This supports the drive for value for money by identifying effectiveness and efficiency, as well as ensuring our budgets align to our business plans.

Responsibilities

4ai The Board will play an active role in horizon-scanning activities designed to identify areas of risk and opportunity across the market which feed into the strategic planning cycle;

4aaii The Board will play an active role in developing and approving the three-year Strategic Plan and oversee the executive with regard to the development of annual Business Plans and budget bids;

4bi The Board and its committees must ensure that BSB policy, regulatory and management decisions are evidence based. The Board, committees and executive will encourage relevant research, appropriate sharing of information and planning to understand the requirements of the market and the impact of its work.

4cii The Board will receive and consider quarterly financial and activity performance monitoring reports from the executive, including commentary and recommendations from the PRP Committee, which oversees performance on the Board's behalf;

4ciii The Board will maintain oversight of the performance of committees, sub-committees, working groups and programme and project boards;

4civ The Board will establish and maintain delegation and virement procedures which accord with the Bar Council's Finance Manual;

4cv The Board will approve the Annual Report which it is obliged by paragraph 11(8) of its Constitution to submit to the Bar Council; the Annual report will be made available publicly in the interests of transparency and accountability.

4di The Board and committees will champion the organisational value of providing good value for money in regulation by targeting and prioritising areas of greatest regulatory risk, using horizon scanning and evidence to pre-empt issues which could prove to be of concern, plan for them, and understand the impact on the market;

4dii The Board and committees will champion the organisational value of providing good value for money in operations by supporting good governance, focussed activity planning, lean budgeting, project management methods, performance reporting, following established policies and applying lessons learned.

Guidance to finance and planning

4.4 To support the Strategic Plan the BSB has created Communications, Research and Equality strategies that are aligned to the corporate objectives. The Bar Council has created HR and IT strategies to help ensure the organisation has adequate resources and infrastructure to achieve its corporate objectives.

4.6 The controls that assist the entire Bar Council with managing its finances are set out in the Finance Manual. This gives details of accounting and authorisation controls in place to help ensure the compliance and effectiveness of the Finance department, good financial governance throughout the Bar Council and BSB, and measures against fraud and misuse.

4.7 The Bar Council is required by the LSA to "take such steps as are reasonably practicable to ensure that it provides the BSB such resources as are reasonably required for or in connection with the exercise of its regulatory functions". The BSB submits a budget bid to the Bar Council Finance Committee, and if any disputes exist as to what constitutes a reasonable resource requirement the Finance Manual includes dispute resolution procedures, which involve formal negotiation steps.

4.8 Corporate governance and internal control systems are used to ensure the BSB controls its budget, and a shared services provision is also controlled using managed Service Level Agreements which pre-empt and avoid resourcing issues, thereby supporting independence and operational effectiveness.

4.9 The majority of the funding for regulatory work is sourced from the Practising Certificate Fee (PCF), charged to barristers annually under s51 of the LSA for "permitted purposes". The Bar Council collects the PCF. The BSB also charges for certain additional regulatory services supplied to very specific users, such as those relating to the Bar Professional Training Course (BPTC), litigation authorisation, and to applications for waivers and exemptions regarding practising requirements and qualifications

About the Bar Council Finance Committee

4.10 The Bar Council's Finance Committee is responsible for designing, implementing and maintaining appropriate financial controls across the Bar Council and BSB. The Finance Committee determines the PCF and the Bar Representation Fee levels and bandings. It ensures the Practising Certificate Fee Schedule policy content is determined, pertaining to the application of the fee. The Finance Committee also has the responsibility for reviewing management accounts and the associated reports provided by the Directors, and receiving, quarterly and annual reports on from the BSB on its business and financial performance.

5. Risk management

Outcomes

5a Regulatory risks are understood and acted on to mitigate the impact on the market and improve regulation in support of the regulatory objectives which are focussed on the public interest

5b Corporate risks are understood and well managed to mitigate the impact on the BSB's operational efficacy as well as to safeguard its assets

Commentary

5.1 The BSB distinguishes between regulatory risks and corporate risks. Regulatory risks are those in the market and activities of the regulated community that the BSB, needs to address in order to promote the regulatory objectives. Those risks are identified and managed through the regulatory risk framework which focuses on the behaviour of the regulated community and other market developments and is therefore predominantly externally facing. The corporate risk register focuses on the BSB and its internal activities. The two intersect when the BSB's own activities could be impacting on the market, or where an occurrence in the market places a demand on the BSB's internal structure or resources.

5.2 The most significant internal operational and financial risks are captured in the corporate risk register, which is reviewed by the executive and monitored by the Board and the GRA Committee on a quarterly basis. Corporate risk management is administered by the Business Support Team in the Strategy and Communications department.

5.3 Other risk oversight and assurance mechanisms exist within the BSB, for example the GRA Committee commissions assurance investigations. These include quarterly reports from an Independent Observer, who provides independent assurance that the BSB's enforcement system is operating in line with its aims and objectives. The Independent Observer assurance statements are published on the website for transparency.

5.4 The GRA Committee's key role is to ensure that a robust corporate risk management system is in place and receive assurance that corporate risks are being well managed. The GRA Committee's role is not to manage any risks itself or to oversee regulatory risks, which the Board has responsibility for.

Responsibilities

5ai The Board will ensure there is an appropriate and comprehensive regulatory risk framework in place to allow the Board, its committees and the executive to manage regulatory risks;

5aii The Board will receive and actively engage with regulatory risk reports produced in line with the Regulatory Risk Framework;

5bi The Board will set up assurance mechanisms to independently investigate and report on corporate risk and performance where necessary;

5bii The Board and committees will seek assurance that the BSB's corporate risk, financial and operational management frameworks are sound and capable of supporting excellence.

Guidance to the Bar Council's corporate risk responsibilities

5.5 The duties of an employer, including all legal requirements such as health and safety, computer misuse and data protection, employment law, pensions and remuneration, financial obligations and asset protection are discharged by the Central Services Directorate of the Bar Council. The members of the executive are employed by the Bar Council.

5.6 The Bar Council establishes a number of corporate policies to mitigate risks to the organisation and its staff and assets. These include the Business Continuity Plan, Fraud Policy within the Finance Manual, Health and Safety Policy, Data Protection and Privacy Policy, Data Retention Principles, and the Whistleblowing Policy.

5.7 The Board and GRA Committee have a role in advising whether the Bar Council policies and procedures adequately control the activities of the BSB. The BSB can hold the Bar Council to account if these risks are not being well managed by reporting to the Bar Council's Audit Committee. The dispute resolution process, required by the LSB's Internal Governance Rules, exists to help resolve disagreements relating to the resourcing and service provision to support regulatory activities.

About the Bar Council's Audit Committee

5.8 The Bar Council's Audit Committee supports the Bar Council and the BSB by reviewing and making recommendations on, without prejudice to regulatory independence, the arrangements in place to provide assurance on governance, risk management, other internal controls, external audit and statutory compliance.

5.9 The Audit Committee advises the Bar Council on all corporate governance matters and reviews the effectiveness of the organisation's internal controls, including financial management arrangements and internal business processes.

5.10 The GRA Committee escalates high risk and cross-cutting risk areas to the Audit Committee where identification and action is required from the organisation as a whole.

Key Links

Independent Observer on BSB website - <https://www.barstandardsboard.org.uk/about-bar-standards-board/how-we-do-it/independent-observer/>

6. Equality and Diversity

Outcomes

6a The work of the BSB meets its obligations under the Equality Act 2010 (6a);

6b The regulatory work of the BSB meets objective of encouraging an independent, strong, diverse and effective legal profession, as set out at s.1(f) of the Legal Services Act 2007.

6c In relation to equality and diversity the BSB may go further than pure legal and regulatory compliance and adopt a best practice approach where practicable and appropriate.

Commentary

6.1 The BSB is advised by a dedicated equality and diversity team and regulatory committee in order to ensure that it meets its legal and regulatory obligations. The team and committee also provide advice and support to the BSB in relation to best practice which it aims to implement where practicable and appropriate.

6.2 The 2013-16 BSB Equality and Diversity Strategy⁴ brings together the key activities undertaken by the BSB as a regulator, and supports the Bar Council as the employer, to advance equality. It gives an overview of the BSB's equality programme and explains how the BSB meets its statutory duties under the Equality Act 2010. It contains a detailed three-year forward plan.

Responsibilities

6ai The Board and committee members must ensure relevant BSB activity is equality analysed;

6aia All Board and committee members must undertake equality and diversity training within three months of taking up an appointment with the BSB;

6aiii All Board and committee members must abide by the Dignity at Work Policy;

6bi The Board and its committees ensure that equality is championed at all levels within the organisation, receiving advice and recommendations from the Equality and Diversity Committee and executive to support this;

6bii The Board and its committees must ensure that BSB policy and regulatory decisions are evidence based. Board and Committee members must encourage relevant research and appropriate sharing of information in order that the BSB is able to understand the requirements of the market and the equality impact of the its work.

⁴ https://www.barstandardsboard.org.uk/media/1511904/bsb_equality_strategy_2013-16_12.6.13_.pdf

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Version Control

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Month 2014	Version 1.0	First version

If you need this document in an alternative format, please contact the Business Support Team

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Supervision – Programme of activity for 2014/15

Status

1. For noting

Executive summary

2. This paper outlines the activity that the Supervision Team will undertake during 2014/15.
3. The activity is based upon the supervision strategy and accompanying guidance that the Board approved in November 2013. This activity includes supervision projects as well as ongoing supervisory activity.
4. The Supervision Team will include 3.5 members of staff. This team will undertake the following supervision projects over the next 12 months:
 - April to May: Impact audit surveys
 - June to September: Supervision returns
 - October to March: Thematic reviews
5. Detailed resource planning has been undertaken to ensure that the Supervision Team can deliver all of these projects alongside ongoing supervision processes and tasks. The resource planning has been based on a number of informed assumptions. These include the following:
 - Approximately 960 chambers will participate in the impact audit survey; and
 - The 400 highest impact chambers will participate in the supervision return project.
6. The ongoing supervision responsibilities of the Supervision Team will include requesting specific information from chambers or entities, working with chambers or entities to reduce risks and ensuring that all identified non-compliance is addressed. Ongoing supervision will focus on the 400 highest impact chambers and up to 50 authorised entities.
7. The Supervision Team will also visit chambers and entities and the resource planning has indicated that it should be possible to undertake up to 70 visits over the next 12 months.
8. Finally, the resource planning will allow for supervision activity in relation to up to 50 individual barristers.

Recommendations

9. The Board is asked to note the proposed supervision activity for 2014/15.

Background

10. In November 2013 the Board approved a new risk-based Supervision Strategy (Annex A) and accompanying guidance (Annex B). It was agreed that risk-based supervision would become operational from January 2014, when the new BSB Handbook came into force.
11. Since risk-based supervision became operational the Supervision Department has been responding to and acting upon information received. This has largely related to concerns about the advertising of pupillages, as well as the treatment of pupils. The Supervision Department has also had some involvement in two chambers' closures.
12. The intention has always been for proactive, chambers-based supervision to begin from March 2014, once chambers have had an opportunity to come to terms with the new Handbook. Therefore since January the Supervision Department has been engaged in finalising policies and procedures and establishing the systems required to implement proactive risk-based supervision. It has been recruiting to fill two vacancies within the Supervision Team; one of these vacancies will have been filled by the time the Board meets and the other is expected to be filled shortly. The Supervision Team will therefore be adequately resourced at the point that active supervision of all Chambers will commence.
13. This paper sets out the activities that the Supervision Team, within the wider Supervision Department, will be engaged in throughout the 2014/15 financial year.
14. The main body of this paper was considered and agreed by the newly constituted Supervision Committee at its first meeting on 18 February 2014.

Comment

15. The proposed activity for 2014/15 is set out below. It is based upon detailed resource planning that has been undertaken by the Supervision Team. This planning relied upon the following assumptions:
 - The Supervision Team will comprise a Supervision Policy Manager, Chambers and Entity Supervisor, Supervision Officer and a part time Administrative Assistant (a total of 3.5 FTE). In addition, there will be available resources from the entity authorisation function of the Supervision Department although the capacity to provide significant assistance on the supervision of chambers will depend on the timing of the BSB's commencement as an entity regulator and on the number and scope of applications that it receives from prospective entities.
 - A panel of advisors will be established with representatives with expertise in each area of regulatory activity. The panel will provide a valuable additional resource to the Supervision Department, particularly in the early stages of operation as the expertise within the Department develops.
 - For resource planning purposes it has also been assumed that the Head of Supervision will not be able to devote a significant amount of time to operational supervision; in practice it is hoped that the Head of Supervision will be able to assist when possible and will be able to provide some assistance particularly during busy periods and in relation to complex or high profile supervision issues;
 - There are currently around 960 chambers (including sole practitioners);

- Following an impact audit, the BSB will focus proactive supervision on the 400 higher impact chambers;
- Therefore in 2014/15 ongoing supervision will encompass 400 chambers and (once the BSB commences entity authorisation) an estimated 50 entities and up to 50 individuals during 2014/15.

Risk assessment framework

16. Supervision of chambers and entities will focus on assessing how effectively they are managing risks as well as the potential impact if risks materialise. This will be informed by the BSB's Risk Assessment Framework.
17. The Board has previously seen and commented on the 5 key risks that chambers will be routinely assessed against. However, consideration will not be limited to these risks if evidence of new or additional risks emerges or if specific additional risks are relevant for a particular chambers or entity.

Impact audit

18. At the end of March 2014 an impact audit survey will be sent to all chambers. Chambers will need to provide information covering areas such as the number of new cases in the last 12 months, their main practice areas, the size of chambers, whether they take pupils and how much direct access work they undertake.
19. The impact audit survey will be sent to all 960 chambers and sole practitioners. The results will be assessed and chambers will receive an impact score. This score will denote how serious the consequences could be if risks were to materialise.
20. The 400 chambers with the highest impact scores will go on to complete a supervision return and will be subject to proactive ongoing supervision.
21. The lowest impact chambers will not need to complete a supervision return as they will be considered low priority for supervision. These are likely to be sole practitioners but will also include some small sets practising in low impact areas and not offering high impact services. This will enable the Supervision Team to target its resources at higher impact chambers where supervision can have the greatest benefit. However, low impact chambers will still be subject to information gathering and their supervision priority will increase if information suggests that this is necessary.
22. The impact audit survey will be undertaken through Uengage, survey and consultation software which has recently been procured from Objective (who provided the Document Management System). This software will enable the assessment of impact audits to be automated and not to require analysis. This is possible because answers to each question in the impact audit survey will be weighted so that the score can be established from the answers. The Supervision Team has established weightings for different responses and tested this on a number of examples to ensure that it will produce reliable results. These have also been reviewed by the Supervision Department.
23. The survey has been created and tested and is ready to go live at the end of March.
24. The software will mean that the impact audit survey will be a largely administrative task. It is anticipated that 8 weeks will be required to complete the impact audit process.

25. All new chambers will also be required to undertake an impact audit but the process will not be repeated for the whole market until 2016/17 at the earliest. However, the impact score of chambers can change in the light of information received by the Supervision Team, for example, if they increase in size or change their practice model.

Supervision returns

26. From June 2014, the 400 highest impact chambers will be required to complete a supervision return. This will be similar to previous rounds of chambers monitoring, although rather than adopting a tick-box approach chambers will be required to explain their processes for dealing with certain matters. It will therefore test their understanding of regulatory requirements and how they are seeking to comply in practice.

27. This will mean that returns will need to be substantively assessed by the Supervision Team. This assessment will identify any risks that are not being managed effectively. All chambers will be informed of the results of the assessment, including their overall priority for future supervision and any risks that the BSB is concerned about.

28. The supervision return process will allow for an initial, desk-based assessment of how well chambers are managing risks. It will therefore inform the level and type of supervision that will be required in the future and will start the process of ongoing supervision. In particular, all risks that are not being appropriately managed, as well as all non-compliance that is identified, will be followed up upon to ensure that they are addressed.

29. It is anticipated that the majority of this process should be completed within 12-14 weeks. As with impact audits, although new chambers will be required to undertake a supervision return, this process will not be repeated for the whole market until 2016/17 at the earliest. In the interim risks will be managed through ongoing supervision, visits and thematic reviews.

Ongoing desk-based supervision of chambers

30. Ongoing supervision of chambers will involve the following tasks:

- Assessing and responding to information;
- Requesting specific evidence from chambers or entities;
- Working with chambers or entities to reduce increased risks; and
- Working with chambers or entities to address non-compliance.

31. This desk-based ongoing supervision of chambers is already active. However, it will be more targeted once an initial assessment has been undertaken through the supervision return process.

32. For the purposes of resource planning it has been assumed that each of these processes will be required as follows:

- Assessing information (in up to 100 instances);
- Requesting specific evidence (for up to 100 chambers / entities);
- Working to reduce increased risks (for up to 100 chambers / entities); and
- Working to address non-compliance (for up to 100 chambers / entities).

Visiting chambers/entities

33. Ongoing supervision will also involve face to face supervision of chambers through visits. High priority chambers will be the main source of visits although there will also be some random visits to low priority chambers and, in due course, entities. Visits will be an opportunity for the Supervision Team to make more detailed assessments of how effectively a chambers is managing risks and ensuring compliance with regulatory requirements. In addition, visits will be undertaken in response to specific concerns; for example pupillage focussed visits.
34. All visits will result in a report being provided to the chambers or entity explaining the assessment and identifying any areas of concern. The supervisor will follow up with the chambers or entity to ensure that any concerns are addressed.
35. Face to face supervision is a new means of the BSB engaging with its regulated community and will be an important aspect of the BSB's approach to supervision. Given the resourcing requirements of the initial impact audit and supervision return, there will be fewer visits in 2014/15 than in future years. However, the resource planning that has been undertaken provides for up to 70 visits in the next 12 months.

Thematic reviews

36. Thematic reviews will be specific projects targeted at high risk areas. The following areas have been proposed so far for thematic reviews in 2014/15:
- Public access work
 - Litigation
 - Immigration
37. The length and resource requirements of a thematic review will depend upon the area and the approach taken. However, even a small thematic review would likely take at least 12 weeks. Given the size of the Supervision Team, overlapping reviews should be avoided. Therefore during 2014/15, there would be scope for one larger thematic review or two smaller ones, with October likely to be the earliest starting point once the supervision return process is fully completed.
38. In April 2014 the Supervision Committee will be considering a paper setting out the business case for the potential areas to cover in thematic reviews so that a preliminary decision can be taken on what areas to cover and when. However, it is also important that any plans retain sufficient flexibility to allow for Supervision Team resources to respond to evidence of other high risk activities that should be prioritised. The Board will be kept informed of proposals for thematic reviews.
39. In future years there will be more resources available for thematic reviews as the supervision return and impact audit processes will not be undertaken for the whole market.

Supervision of individuals

40. The supervision strategy also provides for the Supervision Team to undertake some supervision of individual barristers. This will largely involve agreeing and monitoring plans for improving the administration of individual barristers' practices. Further details can be found in Part C of the supervision strategy guidance.

41. It is difficult to anticipate the extent to which this will be required. Up to this point the Professional Conduct Department has not referred any barristers to the Supervision Team for supervision. However, for resource planning purposes it has been assumed that targeted supervision might be required for up to 50 barristers in 2014/15.

Authorisation of entities

42. It is anticipated that the BSB will become an entity regulator in September 2014, dependent upon the LSB approval process. An Entity Authorisation Manager will be recruited to the Supervision Department to manage the authorisation process.
43. The Regulatory Policy Department is currently undertaking research to establish a more accurate picture of the types of entities that might seek authorisation from the BSB as well as an indication of numbers. The processes that will govern the authorisation of entities have been developed and these indicate likely time estimates and seniority of staff required. The research and the process mapping will assist in finalising the resource planning around the assessment activity. Our initial assessment is that there is sufficient flexibility within the resources of the Supervision Department to manage in this financial year with the addition of the Entity Authorisation Manager post which has already been budgeted for. However, contingency plans are being developed if that proves not to be the case. In particular, the intention is to train staff outside of the Supervision Department who have some capacity (and the right capabilities) to undertake supervision / authorisation activity if required. It is important to have this contingency given the uncertainty associated with taking on new initiatives such as entity regulation. This is even more acute in an area of BSB activity which will require at times fast response and where there is significant external interest.

Timetable

44. The table below summarises the proposed activity for 2014/15:

Projects		Ongoing supervision activity
April to May	Impact audits	April 2014 – March 2015: <ul style="list-style-type: none"> • Visits • Information gathering and assessment • Requests for specific information • Working with chambers and entities to reduce risk or address non-compliance • Supervision of individuals
June to September	Supervision returns	
October to December	Thematic review	
January to March	Thematic review	

Future years

45. A plan for 2015/16 will be drawn up and presented to the Supervision Committee at the start of 2015 and the Board thereafter. This plan will be informed by lessons learned during the first year of the scheme's operation. It will also be based on early indications as to the interest in entity regulation.

46. At this stage it is difficult to predict exactly what this plan would look like. However, there should not be a need to complete impact audits or supervision returns of the whole market; this will leave significantly more resources for ongoing supervision, visits and thematic reviews.

Resource implications

47. This paper explains how the Supervision Team's resources will be deployed in 2014/15. The proposals do not therefore have immediate resource implications as the activities proposed are based upon levels of resourcing that have already been approved in the 2014/15 budget for the Supervision Department.

48. The Supervision Team will comprise a Supervision and Policy Manager, Chambers and Entity Supervisor, Supervision Officer and a part time Administrative Assistant (a total of 3.5 FTE). The Supervision and Policy Manager and Administrative Assistant are currently in post and the Chambers and Entity Supervisor is scheduled to start work at the BSB on 24 March. The Supervision Officer will be appointed shortly.

49. The Supervision Department budget for 2014/15 also includes provision for an Entity Authorisation Manager. The intention is to recruit for this post in April with a view to the successful candidate starting in July 2014.

Equality impact assessment

50. The new risk-based supervision scheme was subject to equality analysis and impact assessment and the Board approved the scheme on this basis in November 2013. The equality impacts of supervision will be monitored during 2014/15 to ensure that the potential benefits are realised and that risks do not materialise.

51. The main equality risk is that resources are targeted disproportionately at certain types of chambers. The main area of discretion that this could apply to will be the choice of chambers for visits. It is therefore crucial that:

- (i) Visits resulting from specific concerns are properly justified through the risk assessment framework; and
- (ii) There is a defensible and fair means of randomly selecting chambers for visits.

52. These aspects will be subject to specific monitoring and review. The Supervision Committee will hold staff to account on this and any discrepancies will be reported to the Equality and Diversity Committee.

Risk implications

53. The activity set out above should provide an adequate degree of supervision for the 2014/15 financial year, as long as resources are appropriately focussed on high risk chambers, entities and areas. However, there is a risk that uptake of entity regulation will be higher than anticipated, in which case additional resources may be required. However, as set out above, contingency planning is in hand to train members of staff in other Departments to assist in this event.

54. There is also a risk associated to capability of new staff to supervise effectively. New staff will have experience of risk-based regulation and audit but it is unlikely to be in relation to legal services or barristers' services. To mitigate this risk, comprehensive induction plans are being developed to assist new staff to understand the profession. In addition, the Supervision Team will have an expert panel available to provide advice on difficult technical issues. The Supervision Team will be undertaking a number of pilot visits which will also assist in building up expertise and experience in chambers administration.

Impact on other teams / Departments and projects

55. Supervision is central to the BSB's new risk-based approach to regulation. The Supervision and Policy Manager has been working with staff in other BSB departments to establish the role of supervision and how it will interact with other departments. This has included:

- Working with the Education and Training team to establish procedures for handling of information concerning pupillages and for removing pupil supervisors from the register. It has also been agreed that the Supervision Team will be consulted on all new applications to become an Approved Training Organisation.
- Establishing protocols and procedures for visits in conjunction with the Professional Conduct Department and creating forms for referrals of information and cases between the Departments. This work is currently ongoing.
- Working with the Professional Practice Team to finalise the entity regulation application and undertake final planning for entity regulation.

IT requirements

56. Supervision is a central tenet of the BSB's risk-based approach to regulation and it should generate valuable evidence that will assist the BSB to assess and prioritise risks. It is important that IT systems support this and allow for evidence to be gathered, analysed and shared as required, as well as to manage and report on supervision activity. Inadequate IT provision in this regard would represent a risk to effective implementation of risk-based supervision and a wider risk to the BSB's commitment to evidence-based regulation.

57. The IT Department has assisted with scoping the IT specification for supervision and facilitated a meeting with consultants to examine how the Core Database could be amended to support supervision. The Supervision Team is currently assessing whether the Core Database will be able to facilitate evidence gathering and analysis to the level of sophistication required. At the same time there is consideration of other software solutions that could support the optimum use of the evidence that supervision will generate. Cost benefit analysis of each option will follow before any final decision on the IT solution is taken. The Supervision Team will continue to work with the IT Department as the IT element of this project progresses. The required solution will need to be in place in advance of the supervision returns being issued in June and therefore there is sufficient time to ensure that this risk is effectively mitigated.

58. The IT developments that are required in order to support the Impact Audit Survey are close to completion and will be implemented in time to launch the survey. This includes the following elements:

- As set out above, the IT Department has assisted the Supervision Team in the development and implementation of Uengage software to undertake the Impact Audit Survey; and
- The changes that would be required to the Core Database in order to record evidence that will be generated through the Impact Audit Survey have been scoped. These changes will be made and tested prior to 21 April when the initial deadline for the Impact Audit Survey expires and the evidence is ready to import to the database.

Consultation

59. This paper sets out how the resources of the Supervision Department will be deployed within the framework of the supervision strategy that was consulted upon in 2013 and approved by the Board in November 2013. Therefore specific consultation with the public or the profession on the contents of this paper is not required. However, significant communications and publicity have been undertaken (see below) and this has included gathering feedback on the practical application of supervision. Most chambers are prepared for supervision and many have offered assistance in piloting various aspects.

60. The proposals for deployment of resources were considered and approved by the Supervision Committee on 18 February.

Regulatory objectives

61. Risk-based supervision will promote the regulatory objectives as set out in previous papers on the supervision strategy. This particular paper concerns plans for implementing the strategy in order to realise the benefits and fully promote the regulatory objectives.

Publicity

62. The Supervision Team has worked with the Communications Team to develop and implement a communications strategy to support supervision.

63. Extensive communications activity has been undertaken to inform the profession of the forthcoming supervision activity. This has included a “Practical introduction to risk-based supervision” leaflet being sent to all chambers. This leaflet also offered individual briefing sessions to interested chambers and a number of chambers have scheduled briefing sessions for April. The BSB also delivered a presentation on supervision at the Legal Practice Managers Association conference, where over 50 chambers were represented.

64. The Supervision and Policy Manager is available to discuss supervision with chambers on an individual basis and a significant number of chambers have taken the opportunity to call to discuss queries and make general observations.

65. It appears from this communications activity that much of the Bar understands and accepts that risk-based supervision is on the horizon.

66. The Communications Team has also assisted with the preparation and dissemination of news articles and press releases highlighting areas of regulatory concern and encouraging best practice.

Annexes

- Annex A – Supervision strategy
- Annex B – Supervision strategy guidance

Lead responsibility

Chris Nichols
Richard Thompson



Bar Standards Board Supervision Strategy

The BSB is committed to a risk-based approach to supervision. This means that resources will be targeted at chambers, entities, individuals or areas that present the greatest risk. A risk-based approach will mean proportionate regulation; the BSB's Supervision Team will have less interaction with those who are managing risk effectively than those who present a higher risk.

Risk-based supervision will:

- Allow the BSB proactively to identify risks and take appropriate action to prevent them from materialising;
- Encourage more effective risk management by chambers and entities and contribute to improvements in the level of compliance with regulatory requirements;
- Help to prevent negative outcomes for consumers and negative impacts on the regulatory objectives;
- Provide a means of ensuring that identified non-compliance does not recur;
- Allow the BSB to target its resources at those chambers, entities, individuals or areas that would benefit from supervisory attention; and
- Provide the basis for constructive engagement between the BSB and those that it regulates.

Supervising chambers and entities

All chambers and entities must ensure that they are compliant with the regulatory requirements set out in the BSB Handbook. This includes a requirement to have appropriate risk management procedures in place.

The BSB will supervise chambers and entities to ensure that they are managing risk effectively and are compliant with regulatory requirements.

Chambers and entities that manage risks effectively can expect a low level of supervision. Those who are unable to demonstrate that they are managing risks effectively will receive more supervisory attention.

Where issues are identified through supervision the BSB will seek, where possible, to address them with the chambers or entity concerned without resorting to enforcement action.

Supervising individual barristers

All individual barristers will be subject to a basic level of supervision through the annual authorisation process, supervision concerning specific areas of compliance (such as CPD requirements) and involvement in thematic reviews.

If the BSB receives evidence of non-compliance, it could consider enhanced supervision for that individual.

Through enhanced supervision the BSB will assist barristers to identify issues and take appropriate measures to prevent future non-compliance and future detriment to the regulatory objectives.

**BAR
STANDARDS
BOARD**

REGULATING BARRISTERS

Bar Standards Board Supervision Strategy Guidance

The BSB is increasing its focus on supervision to complement the new BSB Handbook. Supervision will be an effective means of encouraging and supporting those that the BSB regulates to effectively manage risk. This will contribute to a regulatory approach that provides the best possible protection for customers and the public interest.

The BSB has adopted a proportionate, ‘risk-based’ approach to supervision. This means that resources will be targeted at chambers, entities, individuals or areas that present the greatest risk. As a result, the BSB’s Supervision Team will have less interaction with those that are managing risk effectively than those that are not.

This guidance accompanies the BSB’s Supervision Strategy. It sets out how supervision will work in practice for chambers, entities and individuals, as well as the risks that the BSB will routinely consider through supervision.

Contents

- PART A: SUPERVISION OF CHAMBERS
- PART B: SUPERVISION OF ENTITIES
- PART C: SUPERVISION OF INDIVIDUALS
- PART D: THEMATIC REVIEWS
- ANNEX A: RISKS

PART A: SUPERVISION OF CHAMBERS

1. Efficiently run chambers, operating at low risk, are in everyone’s best interest; barristers’ and chambers’ operations should run smoothly, the BSB will need to take less enforcement action and consumers’ interests will be protected and promoted. This is why all self-employed barristers, including sole practitioners, are under a duty to ensure that their chambers are administered competently and efficiently. A big part of this is having appropriate risk management procedures in place.
 2. The BSB will supervise chambers to ensure that they are managing risk effectively as well as complying with their other regulatory requirements. It will do so through its Supervision Team.
 3. Annex A sets out a number of risks that the BSB expects well-run chambers to be managing. Chambers should be able to demonstrate that they are operating in a way that means there is a low likelihood of any of the identified risks materialising.
 4. However, the BSB will not limit itself to consideration of the risks set out in Annex A if evidence emerges of additional risks that it needs to respond to.
 5. The Supervision Team will have five main functions (each is set out in more detail below):
 - (i) Assessing the potential impact that each chambers could have if risks were to materialise;
 - (ii) Assessing the likelihood of risks materialising for a particular chambers;
 - (iii) Working with chambers to reduce the likelihood of risks materialising;
 - (iv) Addressing non-compliance;
 - (v) Evidence gathering (to review impact and likelihood assessments).
- (i) Assessing impact**
6. The first step for the Supervision Team will be to assess the potential impact that each chambers would have; this relates to the potential extent of the negative consequences if any risks were to materialise.
 7. The impact assessment will require each chambers (including sole practitioners) to provide information, including:
 - Areas of work undertaken;
 - Number of new cases started in the last 12 months;
 - Whether work is undertaken under the public access scheme;

- Whether pupils are taken;
 - Whether chambers undertakes work within the Money Laundering Regulations; and
 - Whether chambers uses Barco (the Bar Council's escrow account service).
8. The Supervision Team will also consider the effect of each chambers on wider market risks. In particular, this will include consideration of:
- The effect of the chambers' business model, structure or membership on competition and consumer choice;
 - The effect of business models and structures on the professional principles;
 - Risks posed by particular client bases;
 - Risks to the maintenance of a diverse and representative legal profession.
9. Using this information, the Supervision Team will calculate an impact score (which will be communicated with the chambers but not published) and use this to determine whether the chambers will need to complete a likelihood assessment.

(ii) Assessing likelihood

10. The next step after the impact assessments is for the Supervision Team to assess how well risks are being managed in chambers. This is called the likelihood assessment. Here, the word likelihood is referring to how likely it is for the risks identified in Annex A, or other identified risks, to materialise at each chambers.
11. Most multi-tenant chambers will be required to have a likelihood assessment. However, chambers with low impact scores, which will most likely be the majority of sole practitioners and some medium (2-30) sized chambers, will not be involved in a likelihood assessment.
12. The likelihood assessment will comprise a questionnaire type document with questions on processes and systems that chambers has in place to protect against certain risks materialising.
13. In order to assess likelihood, the Supervision Team will look for both negative indicators (which suggest that a risk is more likely to materialise) and positive indicators (measures which demonstrate that a set of chambers is actively managing the risk so as to reduce the likelihood of it materialising).
14. The completed questionnaire is returned to the Supervision Team where it is analysed and a likelihood score is calculated for each separate risk, which then informs an overall score. It is this overall score that will determine a chambers' priority rating; i.e. how much supervisory engagement the BSB believes is necessary to help prevent risks in

chambers materialising. For example, a low risk score indicates that chambers is managing their risks effectively which means they should be low priority for supervisory engagement, whereas a high risk score indicates that a chambers is not managing risks effectively and would benefit from some more attention and support (high priority for supervision).

15. Chambers will be informed of their risk score and any risks that have been assessed at an increased likelihood, as well as any recommended steps chambers should take to lower their score.

Low impact chambers

16. Those low impact chambers and sole practitioners who do not require a likelihood assessment will still be involved in supervision through thematic reviews (see Part D). The Supervision Team will also gather and assess any evidence received from the Legal Ombudsman or other BSB Departments that suggests that there is an increased likelihood of any risks materialising (see paragraph 25). Evidence from either of these sources could result in low impact chambers and sole practitioners being required to undertake a likelihood assessment.

(iii) Working with chambers to reduce the likelihood of risks materialising

17. All chambers will be informed of the results of their likelihood assessments as well as the reasons for this. The results will not be publicly available.
18. Feedback to chambers on their assessment will alert them to factors that have increased the likelihood of risks materialising as well as good practice measures that they could adopt to attempt to reduce the likelihood.
19. The Supervision Team will encourage chambers to engage with these issues and to keep the BSB informed of any improvements that have been made which might serve to reduce their assessment scores. It will also be able to signpost available guidance and support.
20. The less effectively a chambers is managing risk the more involvement the Supervision Team will have with that chambers. In certain circumstances the Supervision Team may also request that a chambers provide an action plan setting out how it intends to manage a particular risk or risks.

(iv) Addressing non-compliance

21. The Supervision process will undoubtedly identify instances of non-compliance with the BSB Handbook. Where evidence of non-compliance is uncovered, the Supervision Team's goal will be to ensure that the issue is addressed and that it is addressed in a manner which should prevent recurrence.

22. The Supervision Team will seek to provide chambers with a period of time in which to prove that the issue will be addressed. A member of the Supervision Team might also request specific information in relation to the issue to establish the extent of the non-compliance or to assess the measures that have been introduced to address it.
23. The Supervision Team will only refer a matter to the Professional Conduct Department to pursue enforcement action in the following circumstances:
- If a chambers has not satisfactorily addressed the non-compliance within a reasonable period of time;
 - If the chambers concerned has a poor history of compliance and engagement with the Supervision Team such that it is unlikely that it would take the opportunity to address the issue;
 - If the non-compliance concerned is very serious.

(v) Evidence gathering (to review impact and likelihood assessments)

Impact assessments

24. Impact assessments will be reviewed for all chambers at appropriate intervals to ensure that they remain up to date.

Likelihood assessments

25. Likelihood assessment will be continually updated as new relevant evidence is received. This will include the following circumstances:
- Where relevant evidence is received from the Legal Ombudsman, another BSB Department or from another source;
 - Where relevant evidence is generated through Thematic Reviews (see Part D); and
 - When a chambers provides new evidence that is relevant to its assessment (for example if it has adopted a new good practice measure).
26. The Supervision Team will also undertake its own evidence gathering in order to ensure that the evidence upon which it is assessing likelihood remains current and relevant. This will not apply to low impact chambers that have not had a likelihood assessment.
27. The frequency and form of this evidence gathering will depend upon how effectively a chambers is managing risk; those who are managing risk effectively and are low priority will be required to provide evidence less frequently than those for whom risks are more likely to materialise (high priority for supervision).
28. The Supervision Team will be able to gather evidence through remote requests for information (desk-based evidence gathering) as well as through visiting chambers in person.

Desk-based evidence gathering

29. Desk-based evidence gathering will have two main forms:

- (i) Supervision returns (such as the Chambers Monitoring programmes of 2010 or 2012), in which a number of chambers will be required to respond to certain enquiries or provide evidence for assessment by the Supervision Team.
- (ii) Specific requests for evidence from a particular chambers. Such a request would be required if the Supervision Team has a query that applies to that chambers.

Chambers visits

30. Visits to chambers will allow the Supervision Team to make a more accurate assessment of how well risks are being managed. Staff will be able to discuss matters with members of chambers and staff and also review policies, files, systems and processes. Visits should also assist chambers to understand any areas of concern so that they can seek to address them.

PART B: SUPERVISION OF ENTITIES

To follow when the BSB has been approved as an entity regulator.

PART C: SUPERVISION OF INDIVIDUALS

Basic supervision

31. All individual barristers will be involved in a basic level of supervision. This includes the following:

- Annual authorisation;
- Monitoring of compliance with CPD requirements; and
- Involvement, as required, in thematic reviews (see Part D).

Enhanced supervision

32. Individual barristers who do not comply with their regulatory requirements may also be involved in enhanced supervision.

33. Enhanced supervision could involve one of the following:

- Monitoring of the individual's overall compliance with their regulatory requirements. This would help the barrister concerned and the BSB to understand the extent of their non-compliance and any reasons for this. This form of supervision would be for a limited period of time.
- Explaining concerns to the individual and providing them with a period of time in which to confirm that they have taken appropriate measures to prevent future non-compliance. The Supervision Department will make the barrister aware of any relevant guidance or other resources that are available to assist them to address the concerns.

34. Barristers who do not comply with enhanced supervision may be referred to the Professional Conduct Department to consider whether enforcement action should be pursued.

PART D: THEMATIC REVIEWS

35. The Supervision Team will also undertake Thematic Reviews to cover specific high risk areas. Thematic Reviews will allow for assessment of compliance and risk management in relation to a particular regulatory requirement, area of work or business practice.
36. The specific areas that will require thematic reviews will be primarily informed by the BSB's Risk Assessment Framework. Evidence gathered from the supervision of chambers, entities and individuals will also help to inform what areas might be considered to be high risk and therefore requiring a Thematic Review.
37. Thematic Reviews might cover all chambers and entities (for example if it relates to a particular regulatory requirement with universal application) or to all chambers, entities or individual barristers undertaking work within a certain category. It might also involve a sample of chambers, entities or individuals within a certain category.
38. The Supervision Team will seek to minimise the frequency of Thematic Reviews and to combine reviews of different areas where possible in order to reduce the burden on those involved.

Evidence gathered through this facet of supervision may be fed into the supervision of chambers and entities as set out above in Parts A and B.

Chair's Report on Visits and Meetings Feb - Mar 2014**Status:**

1. For noting

Executive Summary:

2. In the interests of good governance, openness and transparency, this paper sets out the Chair's visits and meetings since the last board meeting.

List of Visits and Meetings:

24 Feb	<p>Attended Emoluments Committee</p> <p>Introductory meeting with Alistair MacDonald QC, Vice Chair (Chair-elect) of the Bar Council</p>
25 Feb	<p>Attended Select Committee on Communications</p> <p>Attended a meeting with Lord Ahmad of Wimbledon, Minister for Communities, concerning Holocaust Remembrance</p>
27 Feb	<p>Gave a breakfast talk to lawyers at Berwin Leighton Paisner for student charity</p> <p>Attended a speech by Chancellor Merkel</p> <p>Led debate on Holocaust Remembrance</p>
28 Feb	Attended FLBA Annual Dinner at Middle Temple
4 Mar	Attended Select Committee on Communications
5 Mar	<p>Hosted lunch with Derek Wood QC and Professor Andrew Sanders at Middle Temple</p> <p>Attended an Advocacy lecture by Sir Geoffrey Nice and Sarah Clarke at Gresham College</p>
6 Mar	<p>Women Law Professors seminar at LSE</p> <p>Gave talk and tour of House of Lords to Rhodes Scholars</p>
8 Mar	Attended a dinner for law graduates at St Anne's College, Oxford
10 Mar	Met with Hungarian charge d'affaires to discuss Holocaust Remembrance
11 Mar	<p>Attended Westminster Legal Forum on Legal Regulation. LSB Chair called for one regulator only</p> <p>Attended Select Committee on Communications</p> <p>Attended Bench Table, Inner Temple</p>

12 Mar	Met with David Hodson, Solicitor, Family Law Group Attended a speech by Lord Neuberger on Diversity in the Legal Profession in the House of Commons
13 Mar	Attended a Universities meeting at the British Academy
15 Mar	Attending the Bar Council Meeting and meeting with circuit leaders
18 Mar	Attending Select Committee on Communications
19 Mar	Attending a drinks reception, held by the BSB, for committee members and others who have done work for the BSB during 2013
20 Mar	Gresham College Council meeting
21 Mar	House of Lords outreach visit to Burford School
25 Mar	Attending a lunch hosted by the Master of the Temple at Inner Temple to discuss Sharia Law Attending Finance Committee
26 Mar	Attending a lunch meeting with Charles Plant and Paul Philip of the SRA

Equality Impact Assessment

3. No Impact

Risk implications

4. These reports address the risk of poor governance by improving openness and transparency.

Consultation

5. None

Regulatory objectives

6. None

Publicity

7. None

Lead responsibility:

Baroness Ruth Deech QC (Hon)

Director's Report**Status**

For consideration and noting.

Director

1. Key areas in which I have been engaged in the last month not covered in the departmental reports include communication activity with various sectors of the regulated community in relation to the BSB's plans following the LETR and the LSB's s162 Guidance on the subject. I will be convening a "Bar Briefing Group" to assist in marshalling contributions from the different areas and representative groupings in the profession to our development work in this area, within the parameters of, for example, the Internal Governance Rules.
2. I participated in the LPMA conference at which the Vice Chair Patricia Robertson QC and our Supervision Manager Chris Nichols gave addresses; and I gave a response (as did the CEO of the LSB) to a public lecture by Professor Frank Stephen of Manchester University Law School, on aspects of regulatory competition in legal services.
3. I was grateful to Joanne Dixon, our Qualifications Manager, for stepping in very ably but at short notice and at an unsocial hour to address a group of visiting eastern European (EU and non-EU) lawyers at Inner Temple on qualifying for the Bar.
4. Internally I continue to be closely involved in managing the QASA JR process with our legal team and the assistance of Oliver Hanmer; and with the final stages of the entity regulation application work.
5. The preparatory work with Heidrick and Struggles and the Independent Appointment Panel for the recruitment of a successor to Baroness Deech and new Board members is nearing completion and advertisements will appear on 6 and 13 April.
6. As indicated elsewhere in the report, a considerable volume of training activity has been delivered in February and March across the BSB and I have usually opened these sessions. The new performance management system is being rolled out and I will be communicating separately with Board members in relation to "360 degree" reporting for members of the Senior Management team. This is not currently a general requirement of the new system but SMT members have been keen to put this in place at this level.

The Regulatory Improvement Programme (TRIP)

7. The TRIP board have received the report on the penultimate stage of the programme. The report confirms the new team structures, processes and collaborative working methods supported by the Learning and Development Plan, that have been put in place during January and February.
8. The risk assessment framework agreed by the board in October 2013, was adopted with the new Handbook and is in use by the teams. Thirteen key risks to the regulatory objectives have been identified for particular attention and staff training continues. The risk framework will of course evolve over time and will be reviewed by the main Board in June.
9. A policy framework is in development that provides the strategic approach through the policy development lifecycle: from the need to address a problem through development and operationalization to the final stages of monitoring and evaluation. Further refinement is in progress prior to adoption from April. All BSB committees will be introduced to the consistent approach to policy development which the framework represents over the next six months.

Part 1 – Public

10. The previously reported risks to the programme have reduced overall. However, the impact of ongoing discussions with LSB on the BSB entity authorisation application have heavily impacted on resource availability, particularly in the policy team.
11. The training in support of the Learning and Development plan has been in full swing since Christmas covering closer collaborative working and decision making. The training provided on Customer Service that also supports dealing with difficult telephone calls has been particularly well received and was extended to members of relevant Central Services teams.
12. The whole organisation has adopted a common staff competency framework and training is underway to introduce a performance management system that will accompany staff appraisals this April. Full adoption is planned for 2015-16.

Regulatory Policy

13. A number of aspects of the last month's work in the team are elsewhere on the Board agenda.
14. The regulatory policy team continues to field queries on the Handbook and handle matters arising. Advice calls and e-mails have not significantly increased post Handbook launch with most callers simply directed to the relevant section of the Handbook or guidance. Where unanticipated issues have arisen the team is working to assess any impact on the BSBs regulatory aims and find a resolution.
15. Members of the team supported the Director at a meeting with the Public Defender Service to discuss compatibility between the Handbook and a revised version of their code of conduct for PDS advocates. A commitment has been given for the Standards Committee and Board to consider the PDS code at their respective meetings in April.
16. A consultation has been launched on changes to the guidance in the Handbook on returning instructions. A paper on the Cab Rank Rule and Public Access work is included in the papers for this meeting.
17. The main focus of the team's work remains the entity regulation application, including insurance issues, s69 order drafting and consideration of the near parallel Licensing Authority application process. A series of meetings to seek the views of barristers and others on the expansion of regulation to entities have been held.
18. As also indicated below, the team "absorbed" the equality and diversity function and its two staff members at the beginning of the month. A further final addition to the team will come when a Risk Manager is appointed, the recruitment process having now begun – our Risk Consultant completed his assignment this month.

Supervision***Supervision***

19. A detailed paper on planned supervision activity in 2014/15 appears elsewhere in the public agenda.

QASA

20. We await the outcome of the application for leave to appeal to the Court of Appeal. Until that is known there is limited progress that can be made on the implementation of the Scheme.

Entity authorisation

21. Work has now commenced within the Department on the preparation for entity authorisation. A project board has been established chaired by the Head of Supervision, comprising all other Heads of Department, which will lead the implementation of the operational arrangements for entity regulation and will resolve any outstanding policy and governance issues that arise during and after the LSB approval process. The Board will retain oversight of this work through the Handbook Working Group chaired by Patricia Robertson QC.
22. A key part of the planning for entity regulation is trying to establish the type of practice models that the BSB will be asked to authorise as well as the likely number of applications. Focus groups have been held with Chambers and practice managers in order to explore the business models that are currently being considered. Research is also being carried out to get a better understanding of estimated numbers of applications in the first 12 months. The results of this research will be known by early April. This is particularly important for any resource planning so that the Department is adequately resourced (both in terms of capacity and capability) to respond to applications.

CPD

23. A new member of staff will join the Department in April with a specific remit for managing the spot checking process for CPD compliance. The Board will recall that there has been a shift away from requiring all barristers to return their CPD record cards to the BSB to a more proportionate approach of spot checking a sample of barristers each year. This sample will be determined on both a random basis and with reference to risk (so that it can for example target individual barristers with a history of non-compliance). The Board will receive a report on the outcome of the spot checking exercise in October/November 2014.

Education and Training***Post-LETR plan***

24. The Plan will be considered by the Board on 27 March.
25. A second joint workshop with the SRA, to inform the development of separate solicitors' and barristers' competence statements, was held on 6 March.
26. Initial discussions are planned on 26 March with the SRA, on sharing training market data to inform our respective policy development plans.
27. A workshop is to be held with BPTC Providers on 21 March to gather their ideas for the future of the BPTC in light of LETR.
28. The Education & Training Committee plan to discuss future interests in the Academic Stage of training at their meeting on 7 April, prior to initiation of the Quality Assurance Agency's review of the Law Benchmark Statement in May.

Operational updates***Vocational Training***

29. BPTC Providers have progressed with the development of a replacement for BPTC Online, transferring responsibility for course admissions from the BSB to a provider consortium. Evidence suggests that one benefit for all will be a much more functional admissions system.

30. Monitoring visits have been completed at four of the 11 BPTC sites in 2014, with one deferred following a Triggered visit. Reports for all visits will be published online.
31. The review of the BPTC syllabus for Criminal and Civil Litigation is in progress, with drafts having been reviewed by Committee members and by the Examining teams. Work has also progressed in the redrafting of the Ethics syllabus to reflect the new Code of Conduct.

Pupillage

32. Minor redrafting of the Pupillage Handbook has been undertaken, alongside revisions to align with the BSB Handbook, and will be published after approval by the Education & Training Committee early in April.
33. Work continues to streamline the process of Pupil and Pupil Supervisor Registration.

CPD

34. An initial analysis of the introduction of Public Access training from November 2013 will be considered by the Education & Training Committee on 7 April.

Qualifications & Authorisation

35. Following agreement by the Board in January of a plan for increasing staff delegation of decisions by the Qualifications Committee, the Committee will be considering specific proposals from each of its Panels at its meetings on 8 April and 20 May 2014.
36. A small number of applications has been processed (from 22 January) for litigation authorisation.
37. Two appeals to the Visitors against decisions of the Qualifications Committee were heard during February. One appeal against the Committee's decision on an application for reduction in pupillage was allowed and one appeal against the Committee's decision to uphold a decision of the Inns' Conduct Committee was dismissed. Two more appeals are due to be heard during April.

Staffing

38. A number of roles have been filled to consolidate the team following significant turnover at the end of 2013. The following appointments have been made: Saira Majumder (Training Regulations Assistant); Poonam Sharma (Vocational Training Administrator); Robin Briggs (Assessments Officer); Racheal Busingye (Assessments Administrator). The role of Interim Policy & Quality Assurance Manager has been appointed, subject to agreement of contract. All vacancies will have been filled through this cycle of recruitment, with all new staff starting by the end of April.

External liaison

39. **Advocacy Training Council** The Head of Education & Training attended the ATC Conference on Saturday 8 March.
40. **Chairs of Academic Law Associations** The Head of Education & Training will meet with the Chairs of the main Academic Law Associations on 24 March, to discuss the shared interests in LETR.

Equality and Diversity

BSB Equality Objectives 2014-15

41. The E&D team have developed a set of draft equality objectives for the period 2014-15. The Equality Act 2010 (Specific Duties) Regulations 2011 required public bodies to publish equality objectives no later than 6 April 2012. Objectives must be re-published at intervals of not greater than four years following the date of first publication. The BSB reviews and republishes its equality objectives every April.
42. The seven new proposed objectives sit within five priority areas and are aimed either externally at the profession or internally at the BSB Board and Committees. The priority areas have been identified following analysis of the 2013 Biennial Survey of the Bar, the 2013 Bar Barometer and 2014 BSB Board and Committee diversity data. The proposed objectives were presented to the BSB Senior Management Team in March and will be considered by the Equality and Diversity Committee at the end of the month. Following EDC approval the proposed objectives will be presented to the Board in May for approval and publication.

BSB Equality Champions Group

43. The BSB Equality Champions Group met in February and discussed the new online E&D training course for Board and Committee members which is currently in the process of being designed and will replace the current classroom session at the end of 2014. The group put forward a number of ideas for the equality analysis section of the training and suggested some interactive exercises that could be included. It also reviewed the section of the BSB website where equality analyses are published and submitted some recently completed forms from their respective departments to update the current selection.

TRIP Report

44. In February the EDA produced a report analysing staff, Board and Committee diversity data for consideration by the TRIP board. The report highlights diversity issues across the workforce and at each pay band and benchmarks the BSB with other similar organisations such as the SRA. The report also highlights diversity issues at Board and Committee level and this data has been used to inform the development of the BSB's 2014-15 equality objectives.

E&D Team Relocation

45. At the beginning of March the BSB E&D team relocated to the 3rd floor to become a function within the BSB Regulatory Policy team. The BSB and Bar Council E&D teams are no longer co-located, the latter having now moved to the Representation and Policy section of the Bar Council.

Professional Conduct

General

46. As to be expected, with only two months since the launch of the new BSB Handbook, the focus in the PCD continues to be on the bedding down of the new enforcement processes. Therefore, there is little else to highlight on other areas of enforcement work.
47. Two extra training sessions on the BSB Handbook and the new enforcement processes introduced as a result, have been held in the last month for members of the Prosecution Panel and the Professional Conduct Committee who were unable to attend the original

training sessions in November/December 2013. Ongoing sessions on aspects of the new BSB Handbook are taking place at the start of each Professional Conduct Committee meeting to increase familiarity with the changes.

Enforcement database and KPIs

48. Now that all necessary adaptations to the database in light of changes to the new BSB Handbook have been made, including the development of management reports to allow staff to track cases, the Reports and Data Analysis Officer is working on the enforcement database in conjunction with the Supervision Team to facilitate the sharing of information between the two departments.
49. Following the reported dip in performance in Q3, performance against the KPI statistics for the fourth quarter is showing an encouraging rise of 11 percent. In comparison with last year, the annual KPI figures are indicating an overall improvement of more than 10 percent. These figures support the view that the previous lack of management reports had a significant impact on the ability of staff to manage their caseloads.

Judicial Reviews

50. The PCD is subject to four applications for Judicial Review, two of which are currently at the permission stage with the remaining two listed for full hearings.
51. In relation to the JRs regarding the COIC appointments issues, the BSB have been advised that a decision on the outcome of the claimants' applications for permission to appeal to the Court of Appeal can be expected by mid-April 2014.

Strategy and Communications

Press relations

52. This month the BSB secured national and local coverage of the disbarment of Yvonne Turley (Lloyd). This followed a successful BSB prosecution last month. The BSB was mentioned in a number of trade press articles, including a feature on the first barristers to be authorised to conduct litigation. The BSB also appeared several times in *The Law Gazette* and the blog *Legal Cheek*.

External communications

53. New announcements about guidance for solicitors and requirements for advertising pupillage were sent out to clerks and legal practice managers. These activities form part of the ongoing communications work to promote the new supervision strategy. Communications plans for entity regulation and changes to education and training are being drafted.

Online and social media

54. We continue to receive around 50,000 visits per month to the BSB website. At the time of writing, we have almost 8,000 followers on Twitter (up from 7,600+ at the same time last month).

Website

55. A progress update on implementation of the COIC Review recommendations was published on the BSB website.

Committee members' thank you event

56. A thank you event for committee members and panel prosecutors, including those who finished their terms at the end of last year, was held on Wednesday 19 March at Gray's Inn.

Publications

57. Our external designers have restarted the design of the Bar Barometer, which is a joint publication with the Bar Council. The Business Plan is due to be signed off at the Board meeting and published by the end of the month.

Bar conference

58. We are starting to plan our proposed workshop at 'The Annual Bar Conference 2014: Celebrating Excellence', which will be held on Saturday 8 November at the Westminster Park Plaza. Potential themes include authorisation to conduct litigation, supervision and LETR.

Consumer stakeholder event

59. Arrangements for the second consumer stakeholder event are progressing well with attendance confirmed by a number of organisations including: Citizens Advice, Victim Support, Personal Support Unit and the LSB Consumer Panel. We are working with colleagues from within and outside the organisation to develop the content of the day which will focus on increasing understanding of how the system works and looking at what could be done to make it more accessible .

Staff recruitment

60. Recruitment for a new Communications Manager is progressing with initial interviews are already underway.

Business management***Governance Manual***

61. The Governance Manual is presented to the Board in these papers. A separate paper discussing the approach to delegations across the BSB to implement the strategy, is also presented in the private session.

Standing Orders

62. The Business Support team, along with the Governance, Risk and Audit Committee is developing a detailed review of the Standing Orders. Any discussion of governance changes or activity outlook at the Board's April Away Day will feed in to the review as the document needs to underpin the governance approach and ways of working chosen by the Board.

Members' Induction

63. A review of process, materials and support required by Board and committee members on joining the BSB is being undertaken by the Business Support Team and HR Department, informed by committee secretaries, and members themselves in the coming months.

Budget and business planning

64. The Business Plan is before the Board for consideration at this meeting. Since the last Board meeting, the business support team has focused on ensuring we have accurate data

in the activities, budget and staffing sections. The team has also been working closely with Finance and all other BSB departments to finalise our revised budget for presentation to Finance Committee.

Contracts Management

65. A review of the Service Level Agreements we have in place with our Central Services colleagues is being carried out and the finalised versions will be presented to PRP in May 2014.

Regulatory knowledge and information

Research

66. Work is almost complete on two important research publications: the Bar Barometer and Biennial Survey of the Bar. Publication is anticipated shortly.
67. Research and Regulatory Policy joined up to conduct a small scale project on what Barristers, Practice Managers and Clerks think about entity-based regulation. Three focus groups were completed in March, two in our offices in London and one at a chambers in Bristol. In addition a short survey was distributed online to gather the motivations for setting up an entity, how soon barristers would like to establish an entity and the type of structures considered, as well as how the BSB can best support this. The survey closed Monday 17 March.
68. A research strategy is being finalised based on recent in-depth engagement with internal stakeholders.
69. Research and Supervision are in discussions to begin a project on Youth Courts Advocacy. An *Expression of Interest* will be sent out at the end of this month followed by an *Invitation to Tender*.
70. Research and Supervision held a workshop on 19 February to scope the QASA Two Year Review along with members from SRA and ILEX. Another workshop is due to take place at the end of this month.
71. Currently, Research and Education are analysing Pupillage trends.
72. Research colleagues attended the first meeting in relation to the Bar Council's project to evaluate the impact of LASPO to discuss project objectives and methodology.

Central Services Report - Updates on Key Business Projects

Current Key Business Projects

SPACE

73. The final phase of the SPACE programme has been completed with the representation and policy and Executive team staff relocating to the 2nd floor over the weekend of 1 March. The facilities team will be clearing the upper floors during March in line with the vacant possessions agreement with the Landlord.
74. A project closure report is under development to look at reporting against projected benefits/outcomes and to successfully handover into business as usual.

Document Management System

75. The transition from the G Drive continues to build momentum, still with an aim to work exclusively from the Document Management System from April.
76. File planning redevelopment in the BSB continues in order to look at a functional approach to managing information and data.
77. Further technical work is planned to integrate the DMS with our scanning facilities and content management system. Access points are being clarified to ensure that the DMS is accessible remotely through tablets, IPADs, laptops and home PCs.
78. The inaugural DMS champions' community of best practice meeting took place in February to start to build further best practice in use of the system. A repository of best practice guidance has been developed and stored on the DMS to help users across the business.
79. Two case study workflows have been created with the BSB Committees and Board Officer and the Fees Collection team in R&P to look at automating processes and creating some efficiencies.
80. The IT team continue to deal with all helpdesk queries with regards to the DMS whilst recruitment continues for an Information Manager to take on the development of policies over the next year in order to develop our chances for ISO accreditation.

Authorisation to Practise

81. The annual Practising Certificate renewal and fee collection process opened on 10 February, one week later than planned. The delay was caused by functional problems with the web portal identified through the pre-opening testing programme. The first 48 hours of operation were characterised by poor system performance and several hundred barristers logging on in that process were affected by slow response times and web pages crashing. Since Wednesday 12 February, the system performance has improved and reported problems have reduced to single figures each week.
82. The rate of completion amongst the profession at this stage is significantly higher than expected with 8,200 barristers, over half the profession, completing the process (either paying individually, or delegating payment). This is likely due to earlier opening of the renewal process and better communication to the profession. However, approximately 5000 barristers had not yet engaged in the process and as of 5 March, weekly reminders were being targeted to encourage completion. By 19 March some 12,000 barristers had completed the process.
83. The Records team have received 6,000 requests for support through calls and emails with a large portion of queries being administrative (password reminders, changes of address etc). This is a significantly lower ratio of queries to members than in the past.
84. The Project Management team have begun the process of capturing lessons learned to improve future engagement with the profession and practice.

Pension Auto Enrolment

85. There are 64 employees who are subject to Auto Enrolment. All employees have been contacted directly and invited to attend one to one consultations, along with several presentations from our current pension provider. We are on target to enrol employees for 1 April 2014.

Upcoming projects*Legal Aid Sentencing and Punishing Offenders Act (LASPO) research project*

86. This Bar Council project has been initiated and is now live and being managed by the Remuneration and Fees team, the Project Management Office continues to play a quality assurance role.

Intranet

87. The arrival of new staff in the Project Management Office (see below) means that we now have dedicated resource to driving this project forward.
88. The first stage is to undertake some preliminary business analysis and develop a clear business case for the intranet project.

CPD Regulation Implementation

89. The project management office is managing this project working with the BSB Project Sponsor, Simon Thornton Wood, Head of Education and Training. This project is still at the initiation stage and development of the business case and scope is under way – aiming for initiation of the project in April.

Corporate Management Information

90. As a result of a discussion at the BSB's Governance, Risk and Audit Committee a mandate for a project has emerged to look at creating consistency and accessibility in our Corporate Management Information (Including HR, Finance, Projects and Risk).
91. The project has been raised through the project gateway process through the Project Management Office and the business case is under development as a Central Services led project and will be aligned with the Intranet project.

Process efficiency project

92. The PMO is looking at initiating a project to look at process efficiency across the organisation during April / May 2014 to build on the BSB's TRIP programme and process efficiency workshops that took place in the latter part of 2013.
93. The project will target key problem process areas and look at how we can improve them a better utilise our current systems – this will include looking at DMS Workflow and use of the Core Database.

Team & Function Updates*Project Management Office*

94. The Project Management Office has two new arrivals. Baljit Dhillon, Project Manager, and Edgar Wodu, Business Analyst. As well as new projects, this expansion will enable a focus on the wider remit of the PMO beyond direct project management; including embedding PM standards and developing the skillsets of staff during the spring and summer months.
95. A new project gateway process has been documented and agreed after trialling the new process. The PMO will work on widening awareness of this process in the next few months so we move to a position where all projects come through this process; in order that new projects are properly scrutinised and we have a central repository of data around project performance.

Finance

96. The interim year end audit has commenced with Haysmacintyre and preparations are underway for the year end at 31 March.
97. A number of process and procedure changes are being developed in order to address weaknesses within the control and reporting environment. These changes will be discussed and agreed with relevant managers across the organisation before being rolled out.
98. Nick Miller, Senior Management Accountant, returned from paternity leave in early March.

Human Resources

99. A review of HR services has meant some further changes in the support roles in the team and new recruitment to them is consequently underway.
100. Recent successes in other recruitment activity have resulted in a 10% drop in overall recruitment activity. The HR team is now managing 19 vacancies, with nine offers already accepted. We anticipate continued shortening of recruitment time and lowering of costs over the coming months.
101. Workshops have now been confirmed and booked for all employees to undergo the training for the new Performance Management Review. Starting from 17 March, we expect completion by end of July 2014.

Facilities

102. The BC has negotiated a cash settlement in respect of vacant possession of the four floors being surrendered, relieving BC of the responsibility for any works of repair, reinstatement or decoration. Further negotiations are taking place with the landlord regarding the rent review.
103. The new room booking system, integrated with Outlook, is on track for launch at the end of March.
104. The Print Room has capacity to take on additional print production work at a lower rate than that which can be achieved externally.
105. The landlord has proposed some improvements to the common areas (eg staircases, toilets and entrance areas) and further communication to staff will take place after the scope of activities are agreed.
106. We intend to produce an energy efficiency policy and establish a cross divisional team to support its implementation.

Records

107. Two temporary staff members joined to support the ATP process and have been successfully inducted and trained. They will leave after the ATP process has completed at the end of March.
108. An issue has been identified where the team had been providing incorrect information to third parties regarding the legality of pretending to be a barrister. As a result, the standard operating processes for various enquiry activities are being reviewed with BSB colleagues to ensure that the regulatory responsibilities are met and communication of potential breaches improved.

Information Services

109. Work is underway to provide a solution (Objective uEngage) for the supervision team to enable chambers to complete an online impact audit– the project is on track.
110. The BC/BSB new WiFi solution which will provide improved internal network access and standard internet access has been designed and first stage of installation will commence on the weekend of the 5 / 6 April. We estimate that it will be live by mid-April.
111. A new member of staff joined the team on 10 March to provide additional assistance with 1st line support; this is for an initial three months. We still recruiting for a new Information Manager role.

Dr Vanessa Davies
Director, Bar Standards Board
20 March 2014