BAR STANDARDS BOARD

REGULATING BARRISTERS

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1. Purpose of this policy and guidance

1.1 From time to time, the Bar Standards Board (BSB) may need to revisit certain regulatory decisions that have been taken in a case. A review may be appropriate for a number of reasons, such as where new evidence has come to light that undermines the original decision, or because the decision has been reached following a process that may have been flawed.

1.2 This document sets out the BSB's policy and procedures in relation to reviews it may undertake of certain regulatory decisions, including the role that the BSB's Independent Reviewers (IRs) may have in relation to such reviews.

1.3 This policy does not concern regulatory decisions against which there is already a formal right of review or appeal provided for within the BSB's processes. The decisions that are capable of review in accordance with this policy are listed at paragraph 4.1 below.

1.4 This document sets out broad principles which are aimed to assist those dealing with reviews of regulatory decisions. The processes set out need not be applied rigidly where there are circumstances justifying adjustments in the interests of fairness and staff will consider carefully what fairness may require in any particular case. However, the reasons for any decision to depart from the policy and guidance will be documented in writing.

2. Regulatory Framework

2.1 The BSB has explicit powers to revisit certain regulatory decisions taken under the Enforcement Decision Regulations (Part 5: Section A of the BSB Handbook). They are:

- the power under rE14.2 to withdraw an allegation and treat it as if a decision under rE12 had not been made; and
- the power under rE61 to reconsider an allegation which has been disposed of where new evidence becomes available that leads it to conclude that it should do so or for some other good reason.

2.2 Where there is no explicit power to revisit a regulatory decision, the BSB may be able to revisit a decision as a matter of good administration in accordance with the terms of this policy.

3. The Independent Reviewers[1]

3.1 The role of the IRs was created by the BSB to provide an independent mechanism for quality assuring the BSB's regulatory decision-making. The main focus of the role is on reviewing regulatory decisions taken in individual cases and carrying out regular audits of cases to provide assurance in relation to staff decision-making and case handling. The IR can also carry out thematic reviews of trends arising from the BSB's regulatory decision-making where issues of concern are identified that require more in-depth evaluation.

3.2 The role and functions of the IRs are not set out in the BSB Handbook. Instead, the role and functions, and the processes associated with the IRs' work, are determined by "policy". The IRs therefore have no direct decision-making powers and can only make non-binding recommendations. The IRs' role should therefore be viewed as an advisory function. Decisions as to whether to accept an IR's recommendations are ultimately a matter for those in whom the power to take a particular decision is vested.

3.3 In relation to the IRs' review function in individual cases, the IRs are a resource that is available to the BSB where a case would benefit from a perspective that is independent from the executive. A review by an IR is not a mandatory feature of our processes and is not therefore necessary in all cases where a regulatory decision needs to be reviewed.

3.4 The IRs do not carry out reviews on behalf of persons involved in cases and cannot be asked directly to carry out reviews by those the BSB regulates or those who have reported concerns. In the absence of a request from BSB staff under the procedures below, the IRs have no power to review decisions in individual cases and will not communicate directly with individuals involved in cases.

Professional Conduct and Behavioural Expectations

3.5 IRs must maintain the highest standards of professional conduct, objectivity, and integrity. In executing their advisory duties, IRs are expected to:

[1] It should be noted that there is a separate Independent Reviewer for Examinations. This is someone with Higher Education and assessment expertise. This does not fall within the remit of the IRs or this policy.

3.6 **Collaborate and Support:** Work collegially with peer IRs to share best practices, discuss complex regulatory interpretations, and provide cross-cover support during high-volume periods.

3.7 **Communicate Professionally:** Maintain a constructive, respectful, and objective tone in all interactions with BSB staff, other Independent Reviewers, the Independent Decision-making Panel (IDP), and parties to the review.

3.8 **Maintain Confidentiality:** Treat all case files, draft reports, and internal deliberations as strictly confidential.

3.9 **Commit to Continuous Development:** Participate actively in peer reviews, annual refresher training, and quality assurance feedback loops.

The Independent Reviewer Bench (Flexible Capacity)

3.10 To manage fluctuating workloads, mitigate backlog risks, and ensure adherence to the 80% completion target, the BSB shall maintain an 'Independent Reviewer Bench'.

3.11 The Independent Review Bench should consist of circa 20 IR, with different specialisms and experience, at any one time. As Independent Reviewers in this population leave the role, a new Independent Reviewer should be recruited in their place.

3.12 **Contractual Framework:** Bench IRs are fully qualified reviewers recruited on worker agreements (as will all Independent Reviewers). Expectations are clearly managed with the individuals that they may have periods of inactivity but may be called upon at short notice and must be responsive.

3.13 **Activation Triggers:** Bench IRs will be activated during busy operational periods, sudden surges in RFR volumes, or when thematic reviews pull core IRs away from individual cases, other examples of when Bench IRs may be activated include:

i Cover is required for absence or holidays

ii SLAs and KPIs are at risk of not meeting targets

3.13 **Quality Integration:** Members of the Bench are subject to identical behavioural expectations, onboarding and training protocols, and Senior Independent Reviewer quality assurance spot-checks as core IRs.

4. The Senior Independent Reviewer (SIR)

9.1 The BSB will appoint a Senior Independent Reviewer (SIR) to provide governance, onboarding, training, and robust quality assurance (QA) across the IR function, alongside reviews of individual cases.

Core Additional Responsibilities

9.2 **Onboarding and Induction:** The SIR is responsible for onboarding all newly recruited IRs, ensuring they undergo a comprehensive induction regarding the BSB Handbook, regulatory enforcement regulations, and standard report-writing formats.

9.3 **Mandatory Training:** The SIR will design and deliver initial and annual training (alongside BSB staff), focusing on developing process knowledge and decisionmaking consistency.

9.4 **New-Starter Quality Assurance:** The SIR will conduct a 100% mandatory sign-off review on the first five draft reports produced by any newly appointed IRs. Feedback must be integrated before the report is shared with the parties.

9.5 **Spot-Checking Experienced IRs:** To maintain strict quality control, the SIR will conduct random spot-checks as deemed appropriate on closed cases handled by experienced IRs, assessing them for objectivity, clarity, and adherence to timelines.

9.6 **Reporting to GRA:** A summary of the previous two quarters' audit reports and reviews undertaken by Independent Reviewers along with the recommendations sheet should be presented to GRA by the SIR twice a year, normally in July and February.

5. Requests for review

What decisions are eligible for review?

4.1 The following decisions are capable of review in accordance with the processes set out in this document except where there is a formal route of appeal or other review available which is provided for within our processes:

a) decisions of the Contact and Assessment Team (CAT) following an initial assessment of a report about a concern;
b) decisions of the Investigations and Enforcement Team (I&E) in relation to accepting a case for investigation (taken under rE12) and "post-investigation decisions" (taken under rE19, rE22 and rE26); and
c) decisions of the Authorisations team where there is no further right of review or appeal within the BSB's processes, such as in relation to applications for licensed access under the Licensed Access Recognition Regulations.

4.2 Some of the decisions which are not subject to a review under this policy because a formal appeal or review mechanism is available includes decisions:

a) to impose administrative sanctions (however, note that the initial reporter has no right of appeal against such a decision and so may be entitled to ask for a

review of that decision. See also *LED34 – Reconsidering post-investigation decisions*.);

b) on authorisation or withdrawal of authorisation of an Authorised Education and Training Organisation (AETO), a BSB entity or an Alternative Business Structure;
c) on waivers of, or exemptions from, training requirements or other authorisations set out in the BSB Handbook.

Requests for review

4.3 The term "request for review" (RFR) refers to an indication from the subject of a regulatory decision, or a reporter who has brought concerns about a barrister's conduct to us,[2] that they have concerns about a regulatory decision which discloses what, in the reasonable opinion of the BSB, may amount to:

a) a material factual mistake;
b) a material misapplication of the law (including any BSB rules or regulations);
c) a serious procedural error; or
d) new information not previously available which may have led, wholly or partly, to a different decision.

4.4 In relation to post-investigation decisions made under the Enforcement Decision Regulations, the BSB has the power to reconsider a decision in accordance with rE61.2 for "*some other good reason*". That term is not defined but it is anticipated that in most cases the above criteria will be sufficient to capture the range of reasons why a decision may need to be looked at again. There may, however, be circumstances in an individual case where there is a good reason to reconsider a decision which does not fall within the above criteria and the BSB will consider this carefully.

4.5 **Identifying a RFR:** the mere expression of dissatisfaction or disagreement with a decision is insufficient to be treated as a RFR. However, a communication does not need to include an explicit request for a review for it to be treated as a RFR under this policy provided, on its face, the concerns raised fall within the scope of one or more of the criteria at paragraph 4.3 above (subject also to paragraph 4.4 in the case of postinvestigation decisions).

4.6 Where it is clear that the communication is merely an expression of dissatisfaction or disagreement with the original decision and does not fall within the scope of paragraph 4.3 above, the person requesting the review will be informed that no reason has been presented for the BSB to consider looking at the decision again.

4.7 All RFRs must be considered in accordance with the steps set out at paragraphs 4.8 to 6.6 below (unless, in accordance with paragraph 1.4 above, the circumstances of a

[2] Referred to, for ease, throughout the remainder of this document as "the parties", or "party" when the context requires reference to one and not both.

particular case justify a departure from the processes set out in this document in the interests of fairness).

Initial steps following receipt of a RFR

4.8 On receipt of a RFR, the staff member responsible for the case will notify the Head of the relevant team ("the Head") as soon as possible and ideally within two working days of receipt. The staff member will include in the notification their view on the issues raised. If the Head took the decision in question, the RFR will be referred to the appropriate department Director.

4.9 The process that then follows will differ according to whether the decision which is the subject of a RFR was taken by staff or an Independent Decision-making Panel ("IDP").

4.10 **Staff decisions:** The Head or Director will review the issues of concern regarding the decision. If it is clear to the Head or Director from the papers that a material mistake appears to have been made, or new information has been presented that appears to undermine the original decision, then the Head or Director is able to change the original decision - **subject to following the process set out at paragraphs 7.1 to 7.3 below.**

4.11 Where a RFR has been received but it is not immediately clear to the Head or Director whether the concerns raised mean the original decision is in fact flawed or that any new information does undermine the decision taken, or where it is otherwise felt that the RFR would benefit from an independent review, the Head or Director may authorise a referral to an IR. The steps following referral to the IR are set out at paragraphs 4.15 to 6.6 below.

4.12 **IDP decisions:** Where the original decision which is the subject of a RFR was taken by an IDP then the decision as to whether to change the original decision, and if so what to, is one for an IDP to take. This is likely to only arise in relation to postinvestigation decisions as decisions of the IDP in Authorisations cases are generally subject to a right of appeal to the High Court and so fall outside the scope of this policy. Policy *LED34 – Reconsidering post-investigation decisions* should therefore also be read alongside this document.

4.13 Following receipt of a RFR in relation to an IDP decision, the Head or Director will review the issues of concern regarding the decision. If it appears to be clear to the Head or Director from the papers that a mistake may have been made, or new information has been presented that may undermine the original decision, then the Head or Director may direct that the matter is referred to an IDP for a potential reconsideration **– subject to allowing the parties an opportunity to comment prior to any new decision being made by an IDP.** The decision to refer a RFR to an IDP for a potential reconsideration, and the reasons for it, will be communicated to the parties who will be given an opportunity to provide written comments on the appropriate outcome before any further decision is taken by an IDP.

4.14 Where a RFR has been received in relation to an IDP decision but it is not immediately clear to the Head or Director whether the concerns raised mean the original decision is flawed or that any new information undermines the decision taken, or where it is otherwise felt that the RFR would first benefit from an independent review, the Head or Director may authorise a referral to an IR before the RFR is referred to the IDP for a decision. The steps following referral to the IR are set out at paragraphs 4.15 to 6.6 below.

Referral to an IR for a review

4.15 Where a referral to an IR has been authorised in accordance with this policy, staff will note this on the file and will send an email to the IR who is allocated to the case alerting them to the requirement for a review. The staff member will also provide such other information as may be necessary for the IR to enable them to undertake the review, including the deadline by which the IR's report needs to be received (see paragraphs 5.6-5.8 below regarding deadlines).

4.16 In all cases where a referral to the IR for a review of a regulatory decision has been authorised, the staff member responsible for the case will ensure that:

a) the person/body who requested the review and the other party (if any) are informed that this has happened;
b) the parties are informed of the anticipated timescale within which the review ought to be completed; and
c) the parties are given an opportunity to make written comments (if they wish) on the appropriate outcome of the review, which will be taken into account by the IR before concluding the review.

4.17 At the same time, the parties will be informed that in any event if the IR is minded to recommend that a decision is looked at again, or the original decision confirmed but for different reasons, then the parties will be informed and invited to comment before the IR concludes their review.

4.18 Where an IR is asked to review a decision of an IDP, the staff member dealing with the case will, at the same time as making the referral to the IR, notify the Independent Decision-Making Body Team (IDB) of the need to arrange an ad hoc meeting of a panel in order to consider the outcome of the IR review. Whether the case requires a meeting of a newly constituted panel, or the original panel, will depend on the circumstances of the case. LED34 provides more information about this in relation to the reconsideration of post-investigation decisions by an IDP.

6. Review by an IR

5.1 IR reviews are of the original decision and should be based on the information available to the decision-maker at the time the decision was taken and any new information submitted as part of the RFR. Reviews by an IR will generally focus on

whether one or more of the criteria set out at paragraph 4.3 above has been met. However, in relation to post-investigation decisions taken under the Enforcement Decision Regulations the IR will also consider whether there are any other concerns that could amount to a "*good reason*" justifying a recommendation that a decision be looked at again (in accordance with rE61).

5.2 It is not expected that new information or further documentation will normally be gathered by the IR during the course of the review. The need to gather further information could be an outcome in itself of the review (see paragraphs 5.10-5.12 below). However, the IR may, during the course of a review, speak to the person responsible for the original decision or any other members of staff involved in the case to clarify any points or obtain copies of relevant policies/guidance.

5.3 Given the IRs are a creature of policy, the IRs have no direct decision-making powers and can only make non-binding recommendations. The various recommendations that the IR can make, depending on the decision being reviewed, are listed at paragraph 5.9 below. Evidence that one or more of the criteria set out at paragraph 4.3 is met will generally be needed in order to support a recommendation to change or look at a decision again.

5.4 Where an IR is minded to:

a) recommend that the original decision be changed or looked at again; or
b) recommend that the original decision be confirmed but for different reasons; and/or
c) include in their report anything that may be seen to be critical of the subject of the decision

the IR will ensure that a copy of their draft report is shared with the parties to the review, on a strictly private and confidential basis, to allow them an opportunity to comment on the draft before the review is concluded and a final report sent to the decision-maker for a decision.

5.5 At the conclusion of their review, the IR, having considered all the issues (and any comments/representations made by the parties during the course of the review), will prepare a report for the relevant Head, Director or the IDP (as the case may be) which will include the following:

a) The team from which the RFR emanates and to whom the report is directed;
b) A brief summary of the issues, including any parties' comments/representations made during the course of the review;
c) The outcome of the review; and
d) The recommendations for action (see paragraph 5.9 below).

Statement of Work & Tiered Completion Timelines

5.22 IRs are commissioned under a structured Statement of Work (SoW) that categorises cases by complexity to ensure proportionate resource allocation. The case complexity

will be determined and allocated by the BSB. The clock for these timelines begins the on the date of receipt of the RFR.

5.23 **Tier 1: Low Complexity**
Criteria: Straightforward single-issue disputes, factual mistakes, or minor procedural errors with a well-defined evidence trail.
Timeline: Final report must be submitted within 15 working days (3 weeks).

5.24 **Tier 2: Medium Complexity**
Criteria: Multi-issue decisions or disputes requiring clarification from original decisionmakers or a deeper analysis of Handbook rules.
Timeline: Final report must be submitted within 25 working days (5 weeks).

5.25 **Tier 3: High Complexity**
Criteria: Serious or criminal misconduct decisions, cases involving extensive new evidence, multiple conflicting parties, or systemic/thematic implications.
Timeline: Final report must be submitted within 35 working days (7 weeks).

Key Performance Indicators (KPIs)

5.26 The IR function operates a strict performance target requiring a minimum of 80% of all cases to be completed within their stipulated target (15/25/35 working days), regardless of extensions granted for third-party comments. Where an IR has consistently failed to meet their tier-specific timelines, they will be referred to the Head of Governance or IDB Panel Manager for a performance review, and potential disciplinary action.

5.27 In some cases, the party requesting a review may indicate that further information will be provided. If this is the case, then the clock will start from when the further information has been provided. If further information, that was not expected, is received after the referral to the IR, it may be that the deadline for completion of the review will need to be altered.

5.28 If it becomes clear at any time during the review that the anticipated deadline will not be met, the parties must be informed of this by the IR and given a realistic date by which the review will be complete.

Review outcome - recommendations

5.9 The recommendations that the IR can make depend on the decision being reviewed and are summarised below. One or more of the recommendations listed below may be made in relation to a particular case as a result of a review:

a) Confirm the original decision in full;
b) Confirm the original decision but for different reasons;
c) Confirm only part of the original decision;
d) That the decision reached ought to be different;

e) Gather further specific information (see paragraphs 5.10-5.12 below);
f) That some or all issues of concern are referred to supervisory action where the previous decision was not to take action or to take only enforcement action;
g) That some or all issues of concern should be treated as allegations of a breach of the BSB Handbook and investigated where the previous decision was not to take any action or to take only supervision action;
h) That only specific parts of the issues of concern should be treated as allegations of a breach of the BSB Handbook and investigated and/or referred for supervision action where the previous decision was not to take action;
i) That issues of concern which have been treated as allegations of a breach of the BSB Handbook should be withdrawn under rE14.2 of the Enforcement Decision Regulations;
j) In the case of post-investigation decisions, confirm:
    - that there is, in the IR's view, no new evidence or other good reason (in accordance with rE61 of the Enforcement Decision Regulations) to exercise the power to reconsider a decision and that the original decision should stand; or
    - that there is, in the IR's view, new evidence or some other good reason to exercise the power to reconsider a decision (and that the decision should be reconsidered) under rE61 of the Enforcement Decision Regulations.

5.10 **Recommendations to obtain further information:** it is unlikely to be appropriate for a recommendation in relation to a decision made at the initial assessment stage of the BSB's processes to include gathering information from the barrister or BSB entity who is the subject of a report or allegation. This is to avoid the lines between an initial assessment and an investigation becoming blurred. A need to obtain information from a barrister or BSB entity is likely to be an indication that the concerns should be subject to a formal investigation.

5.11 In most cases the need to gather further information will be confirmatory i.e. to confirm whether the original decision or any proposed revised decision was/is appropriate. The IR therefore will normally couch their recommendation in such terms as to allow the case to be concluded without the need for it to be referred back to the IR. For example, if the IR considers the person who reported, or a witness, might have a certain piece of information that would support a recommendation to refer a case to investigation, the recommendation would be that such a referral is made if the information can be obtained, but the original decision confirmed if it is not available.

5.12 There may, however, be occasions when the IR cannot conclude the review until after the information is obtained. Where this situation occurs, the IR will ask the BSB staff to obtain the information and then conclude the review in light of the outcome of the further enquiries.

7. Actioning recommendations made by the IRs

6.1 In all cases where a matter has been referred for a review by the IR, the parties will be informed of the outcome of the IR's review by being provided with a copy of the IR's

final report. At the same time, the parties will be informed that the IR's report will be referred to the decision-maker who will take a final decision on the review.

6.2 Final decisions as to whether to accept or reject an IR's recommendations are a matter for those in whom the power to take a particular decision is vested.

6.3 A decision-maker will generally only interfere with a decision if satisfied that the original decision was materially flawed or if there is new information which would have had a material influence on the outcome.

6.4 The relevant Head or Director is responsible for deciding whether to accept IR recommendations arising from reviews of decisions taken by BSB staff. The Head or Director is responsible for ensuring that accepted recommendations are actioned as soon as possible, including ensuring that the parties are notified.

6.5 In relation to IDP decisions, only an IDP can take the decision on whether or not to accept the IR's recommendation(s). The IR's report will therefore be made available to an IDP, together with the original bundle, the RFR and any new information, in order for the IDP to reach a decision. Reconsideration of IDP decisions in relation to postinvestigation decisions must be taken in accordance with rE61 of the Enforcement Decision Regulations and more information about this can be found in *LED34 – Reconsidering Post-Investigation Decisions*.

6.6 **Non acceptance of IR recommendations:** where a decision is taken that the IR's recommendation(s) should not be accepted, in whole or in part, that decision should be recorded in writing with reasons. The IR should be notified of this outcome in writing and the final decision, with reasons, should also be communicated to the parties.

8. Retaking a staff decision following a RFR without a review by an IR

7.1 Where, following receipt of a RFR in relation to a staff decision, the Head or Director is minded to take a new decision in accordance with paragraph 4.10 above, the parties will be notified of the decision to review and the reasons for it and will be given an opportunity to provide written comments on the appropriate outcome before any further decision is taken.

7.2 Following receipt of any written comments, or where the deadline to provide comments has passed and nothing has been received, the Head or Director will go on to take a final decision on the outcome (taking into account any written comments) and will communicate their decision, with reasons, to the member of staff who is handling the case. The Head or Director will make clear the basis on which they are reconsidering the decision. In relation to decisions taken under the Enforcement Decision Regulations the power to take a new decision will be based on an exercise of the powers under rE14.2 or rE61. The outcome of that reconsideration, including the reasons, will then be communicated to the parties.

7.3 A decision-maker will generally only interfere with a decision if satisfied that the original decision was materially flawed or if there is new information which would have had a material influence on the outcome.

9. Reviews triggered by the BSB on its own initiative

8.1 Reviews of regulatory decisions may be triggered by senior staff at the BSB (i.e. relevant Heads or Directors who have overall responsibility for the core regulatory function to which a decision relates), applying the same criteria as set out at paragraph 4.3 above (subject to paragraph 4.4). However, other than in exceptional cases, the BSB's ability to initiate a review of a regulatory decision of its own initiative is likely to be limited to where it has an explicit power to do so under the BSB Handbook.

8.2 **Staff decisions:** This paragraph applies where a review of a regulatory decision is triggered by the relevant Head or Director in accordance with paragraph 8.1 above in relation to a staff decision. Unless the circumstances of a particular case justifies a departure from this process, the subject of the regulatory decision, and (where relevant) any initial reporter who reported concerns about a barrister's conduct to the BSB, will generally be notified of the decision to conduct a review and the reasons for it
and will be given an opportunity to provide written comments on the appropriate outcome prior to the review being concluded.

8.3 However, it is open to the Head or Director to authorise a referral to the IR first, in which case the processes set out above following referral to an IR (from paragraph 4.15) will apply as appropriate.

8.4 **IDP decisions:** If it appears to be clear to the Head or Director that there may be a material mistake or irregularity in a decision of an IDP, or new information has become available which may undermine the original decision, the Head or Director may direct that the matter is referred to an IDP for a potential reconsideration under rE61. In relation to post-investigation decisions, please also read *LED34 – Reconsidering postinvestigation decisions*.

8.5 Unless the circumstances of a particular case justifies a departure from this process, the decision to initiate a review by an IDP, and the reasons for it, will be communicated to the parties who will be given an opportunity to provide written comments on the appropriate outcome before any further decision is taken by an IDP.

8.6 However, it is open to the Head or Director to authorise a referral to the IR first before any referral to an IDP, in which case the processes set out above following referral to an IR (from paragraph 4.15) will apply as appropriate.

8.7 **Time for comments:** The time period for the provision of any written comments in accordance with any part of this policy will generally be two weeks, unless the particular circumstances are such that it is reasonable to give a shorter or longer

timeframe. Where a response is requested in a shorter timeframe, reasons will be given as to why any comments are needed on a more urgent basis than might usually be the case (this might be influenced, for example, by other deadlines that are dictated by the BSB Handbook).