



## Meeting of the Bar Standards Board

**Thursday 27 November 2025, 5.00 pm** (Hybrid meeting - in person and online)

**Rooms 1.4 – 1.7, First Floor, BSB Offices / MS Teams**

### Agenda – Part 1 – Public

*The meeting will be preceded by a Board Member Seminar at 3.15 pm in the same venue.  
This will follow up action points arising from the October Away Day.*

Meetings will be recorded for the purposes of minute taking as previously agreed by the Board. Your consent to this is assumed if you decide to attend. The recording will be deleted once the minutes are formally approved

#### Page

1.	<b>Welcome / announcements</b> (5.00 pm)		Chair	
2.	<b>Apologies</b>		Chair	
3.	<b>Members' interests and hospitality</b>		Chair	
4.	<b>Approval of minutes from the last meeting (25 September 2025)</b>	Annex A	Chair	<b>3-6</b>
5.	a) <b>Matters arising &amp; Action List</b>	Annex B	Chair	<b>7</b>
	b) <b>Forward agenda</b>	Annex C	Chair	<b>9</b>
6.	<b>Quarter 2 Performance report – balanced scorecard</b> (5.05 pm)	BSB 057 (25)	Mark Neale	<b>11-30</b>
7.	<b>Annual Report 2024/25</b> (5.15 pm)	BSB 058 (25)	Debbie Stimpson	<b>31-72</b>
8.	<b>Governance, Risk and Audit Committee (GRA) Committee - Annual Report 2025</b> (5.25 pm)	BSB 059 (25)	Stephen Thornton	<b>73-78</b>
9.	<b>Performance and Strategic Planning Committee (PSP) Mid-Year Report 01 May 2025 to 31 October 2025</b> (5.30 pm)	BSB 060 (25)	Tracey Markham	<b>79-82</b>
10.	<b>Governance documents</b> (5.35 pm)	BSB 061 (25)	Rebecca Forbes	<b>83-87</b>
11.	<b>Director General's Report – Public Session</b> (5.40 pm)	BSB 062 (25)	Mark Neale	<b>89-93</b>

- |     |   |              |                |           |
|-----|---|--------------|----------------|-----------|
| 12. | <b>Chair's Report on Visits &amp; External Meetings</b>   | BSB 063 (25) | Chair          | <b>95</b> |
| 13. | <b>Schedule of Board Meeting Dates (Jan 2026 – Mar 2027)</b>  | BSB 064 (25) | Rebecca Forbes | <b>97</b> |
| 14. | <b>Any other business</b>   |              |                |           |
| 15. | <b>Date of next meeting</b> <ul style="list-style-type: none"><li>• Thursday 29 January 2026 (2 pm)</li></ul> |              |                |           |
| 16. | <b>Private Session</b><br>(5.45 pm)   |              |                |           |

**John Picken**  
**Governance Officer**  
20 November 2025

**Part 1 - Public**  
**Minutes of the Bar Standards Board meeting**  
**Thursday 25 September 2025 (2.00 pm)**

**Hybrid Meeting, Rooms 1.4-1.7, BSB Offices & MS Teams**

- Present:** Professor Chris Bones (Chair)  
Jeff Chapman KC  
Tracey Markham  
Andrew Mitchell KC  
Ruth Pickering  
Stephen Thornton CBE
- By invitation:** Kirsty Brimelow KC (Vice Chair, Bar Council) – via Teams  
Steve Haines (Consultant)  
Barbara Mills KC (Chair, Bar Council)  
Malcolm Cree (Chief Executive, Bar Council)  
Lucinda Orr (Treasurer, Bar Council)  
Andy Russell (Director, Council of the Inns of Court)
- Press:** Neil Rose (Legal Futures)
- BSB Executive:** Ahmet Arikan (Senior Policy Officer)  
Reshmi Bibi (Regulatory Officer)  
Graham Black (Head of Communications)  
Naznin Chowdhury (Governance & Risk Manager) – via Teams  
Eloise Denchfield (Senior Lawyer) – via Teams  
Mike Farmer (Head of Programmes and Planning)  
Rebecca Forbes (Head of Governance)  
Teresa Haskins (Director of People and Culture)  
Saima Hirji (Director of Regulatory Enforcement)  
Faisal Hussain (Regulation Policy Manager) – via Teams  
Alex Kuczynski (Director of Legal & Information Management)  
Ewen Macleod (Director of Strategy, Policy & Insights)  
Rupika Madhura (Director of Regulatory Standards)  
Natasha Mutch-Vidal (Diversity, Inclusion and Wellbeing Manager)  
Mark Neale (Director General)  
Richard Parnham (Handbook Manager)  
John Picken (Governance Officer)  
Mark Platt (Head of Policy)  
Debbie Stimpson (Director of Planning, Programmes & Engagement)  
Adelita Thursby-Pelham (Head of Authorisations)  
Kirsty Totimeh (Senior Policy Officer)
- Resource Group:** Richard Cullen (Director of Finance) – via Teams

**Item 1 – Welcome / Announcements**

1. Chris Bones welcomed those present to the meeting (also his first as Chair of the Board). He also welcomed first-time attendees, Faisal Hussain and Mahalia Davis (the latter attended for Part 2 of the meeting).
2. He also confirmed that Heidi Stonecliffe KC will be the new Vice Chair of the Bar Council as from 1 January 2026. She will be the first employed barrister to hold this post.

3. **Item 2 – Apologies**

- Gisela Abbam
- Emir Feisal JP (attended for Part 2)
- Ruby Hamid
- Irena Sabic KC
- Leslie Thomas KC

**Item 3 – Members’ interests and hospitality**

4. None.

**Item 4 – Approval of Part 1 (public) minutes (Annex A)**

5. The Board **approved** the Part 1 (public) minutes of the meeting held on 24 July 2025.

**Item 5a – Matters arising & Action List**

6. The Board **noted** the action list. In respect of min 13b (24/07/25), Mark Neale confirmed that, subsequent to the last meeting, he and Kirsty Brimelow KC had discussed the process for resolving reports generated from social media. That action is therefore now complete.

**Item 5b – Forward agenda**

7. The Board **noted** the forward agenda list.

**Item 6 – Ratification of out of cycle Board decision re: Rule Change Request – Inns’ Conduct Committee**  
BSB 045 (25)

8. The Board **ratified** its earlier out-of-cycle decision to approve a rule change at the request of the Inns’ Conduct Committee.

**Item 7 – Update and next steps – First-tier complaints consultation**  
BSB 046 (25)

9. Ahmet Arikan introduced the paper which followed the outcome of an earlier consultation on first-tier complaints. He also referred to the report’s recommendations for changes in the Handbook (Annex A) and an associated data collection policy statement (Annex B). *Note: the proposed changes have been mandated by the Legal Services Board (LSB) using its powers under section 112 of the Legal Services Act.*
10. Andrew Mitchell KC commented that:
  - there may be some guidance required so that in addressing the LSB’s requirements, what is proposed is also reasonable and proportionate;
  - for example, the proposal that barristers must notify a client of their right to make a complaint both at the point of instruction *and* on the conclusion of the matter. Since the relevant start and finish time can be

quite short, this seems a potentially unnecessary duplication;

- what is termed a “complaint” is very broadly defined, to the point where even a mild disagreement could be classed in those terms and so trigger the complaint procedure. *Note: Jeff Chapman KC supported this point ie the definition provided in Part 6 (Annex A) is so wide as to encompass any degree of dissatisfaction, whereas, for reporting purposes, a proportionate approach is required;*
- the equivalent rules for solictiors are such that issues are managed informally as a first step, which does not require formal reporting.

11. In response, Ahmet Arikan stated that:

- the high-level definitions included in the annex simply reflect those quoted by the Legal Services Board;
- we will further consider the specific point about client notification, and clarify that through guidance notes for the profession;
- likewise, in respect of definitions for a “complaint”, we will establish a Working Group involving the Legal Ombudsman and peer regulators, so as to gain common understanding of what this means in practice.

12. The Chair referred to the government’s growth agenda and the need for regulation to be fit for purpose in that context. He therefore agreed with the need for a proportionate approach as mentioned above.

13. Stephen Thornton noted that a cost estimate for data collection on first-tier complaints is not provided in the paper. It would be helpful to have this available by the next meeting. Mark Neale agreed to this request.

14. In response to a question from Tracey Markham, Ahmet Arikan confirmed that there will be an evaluation of the effectiveness of the new rules within two years of the start date. The executive is already aware of the risks of negative impacts on smaller chambers as stated in the paper. In addition some areas of the Bar are more likely to be the focus of dispute than others given the nature of their practice. In consequence the review will include specific feedback from relevant Specialist Bar Associations.

15. At the end of the meeting, the Chair invited observations from the guests present. The following comments were made:

- clarification of points made earlier about the paper on first tier complaints (cf. min 10). *Note: in this respect, an assurance was given that these comments were drafting changes rather than any shift from the substance of the LSB policy.*
- the plan is for barristers to comply with the new rules for first-tier complaints within four months. This includes the Christmas and New Year period, however, which reduces down the actual time available so an extension may be necessary;
- there are occasions when what might be seen as complaints are received by barristers from clients who are mentally unwell. In these circumstances a different approach may be required that acknowledges this fact and should be incorporated into guidance for the profession.

16. The Chair welcomed these contributions. The following points were made:
- data collection based on the new rules will come into effect as from 1 April 2026 but that is the limit of any immediate impact. There will be no obligation to submit reports at that point;
  - the point on dealings with mentally unwell individuals can be incorporated into discussions with the Working Group (cf. min 11).

17. **AGREED**

- |    |   |                   |
|----|---|-------------------|
| a) | to note the responses to the consultation on First-tier Complaints and to approve the approach to implementation as set out in the paper.   |                   |
| b) | to approve the draft BSB Handbook changes set out in Annex A of the report subject to additional drafting points and guidance that underscore the need for a proportionate approach to the management of first-tier complaints within chambers and how these are recorded for reporting purposes. | <b>AA</b>         |
| c) | that, subject to (b) above, to approve the draft BSB first-tier complaints data collection policy statement at Annex B of the report.   | <b>AA to note</b> |
| d) | to ensure that the point raised about complaints from mentally unwell individuals (cf. min 15). is considered by the Working Group on First-Tier Complaints.  | <b>AA to note</b> |
| e) | to ensure a cost estimate is provided in respect of first-tier data collection by the BSB (cf. min 13).   | <b>MN</b>         |

**Item 8 – Director General’s Report – Public Session**

BSB 047 (25)

18. The Board **noted** the report.

**Item 9 – Chair’s Report on Visits and External Meetings**

BSB 048 (25)

19. The Board **noted** the report.

**Item 10 – Any Other Business**

20. None.

**Item 11 – Date of next meeting**

21. Thursday 27 November 2025 (5.00 pm)

**Item 12 – Private Session**

22. The Board resolved to consider the following items in private session:

- (1) Approval of Part 2 (private) minutes – 24 July 2025.
- (2) Matters arising and action points – Part 2.
- (3) Performance in 2025/26
- (4) BSB Corporate Risk update for the Board.
- (5) Business Plan & Budget for 2026/27.
- (6) Harman Report.
- (7) Compliance with LSB Statements of Policy.
- (8) Reform and reorganisation
- (9) Director General’s Report – Private Session.
- (10) Any other private business.
- (11) Board Member-only discussion

23. The meeting finished at 2.20 pm.

## BSB – List of Part 1 Actions

27 November 2025

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

Min ref	Action required	Person(s) responsible	Completion Due Date	Progress report	
				Date	Summary of update
17b (25/09/25)	amend and publish the first-tier complaints consultation to take account of comments made at the September Board meeting re: additional drafting points and guidance that underscore the need for a proportionate approach to the management of first-tier complaints within chambers and how these are recorded for reporting purposes	Ahmet Arian	06/10/25	06/10/25	<b>Completed</b> – consultation document published on BSB website
17e (25/09/25)	ensure a cost estimate is provided in respect of first-tier data collection by the BSB	Mark Neale	06/2026	19/11/25	<b>On track</b> – we shall collect this data from chambers for the first time, at earliest, in Spring 2027. (We are currently awaiting LSB approval for our regulatory changes.) We intend to provide an estimate of the costs to the BSB and to chambers in advance by Q2 2026.





**Forward Agenda**

**Thursday 29 January 2026 – 2 pm start**

- Director General's Report (public & private session)
- Reform and re-organisation
- BSB Values and Behaviours
- Enforcement Regulations – outcome of consultation
- BSB Strategic Plan – Consultation
- Board recruitment

**Wednesday 25 March 2026 – 5 pm start**

- Director General's Report (public & private session)
- Q3 performance report
- Reform and re-organisation
- Corporate Risk Report
- Final Strategy approval
- Final Regulatory Risk Framework Report
- Final Business Plan & Budget Plan 2026-27
- Governance review (review of compliance with the 2024 UK Corporate Governance Code)



<b>Meeting:</b>	Board	<b>Date:</b>	27 November 2025
<b>Title:</b>	Quarter 2 Performance report – balanced scorecard		
<b>Author:</b>	Imogen Kirby, Business Insights Manager Ben Bray, Head of Regulatory Risk and Insights		

<b>Paper for:</b>	<b>Decision:</b>	<b>Discussion: X</b>	<b>Noting</b> <input type="checkbox"/>	<b>Other:</b> <input type="checkbox"/> (enter text)
-------------------	------------------	----------------------	--	---

**Paper relates to the Regulatory Objective (s) highlighted in bold below**

- (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
- (f) encouraging an independent, strong, diverse and effective legal profession
- (g) increasing public understanding of citizens' legal rights and duties
- (h) **promoting and maintaining adherence to the professional principles**

☐ Paper does not principally relate to Regulatory Objectives

### Purpose of Paper

1. This cover paper provides background information for the Board relating to the quarterly balanced scorecard KPI report covering Quarter 2 of 2025/26 – annex A.

### Recommendations

2. The Board is invited to discuss the report. The main factor affecting performance, particularly timeliness, in the first half of the year has been the near 25% increase in reports on barristers' conduct. We understand this reflects the experience of other front-line regulators. There is no single predominant cause of the increase.
3. There is a separate paper for the private session of the Board setting out a mitigation strategy aimed at increasing operational resilience in the face of fluctuating workloads.

### Methodology: Exception reporting approach and metrics

4. The KPIs are annual targets and so in the Quarter 2 Performance Report the performance is reported for the whole of 2025/26 to date (covering the first half of the year), and compares it to performance in 2024/25. The performance of the last quarter (Q2) is included for completeness. However, the small numbers involved in quarterly reporting mean that these figures can move up or down sharply from quarter to the next without reflecting a real change in performance. They should not usually be used to judge performance trends.
5. Following discussion with the Director of Regulatory Enforcement and the Head of POCU in September, work completed by the Post Office Case Unit is now excluded from the Timeliness, Productivity, and Workload numbers for CAT and I&E.

**Key performance issues***Enforcement: workload fluctuations*

6. Despite the elevated number of reports received in Q2, productivity kept pace: 572 reports were assessed compared to 567 received. This was despite the temporary loss of a senior member of the Contact and Assessment through illness and system issues with the Case Management System which disrupted operations for six weeks (but which have now been resolved)

*Authorisations' Performance*

7. Authorisations' performance in processing all thirty application types continues significantly to improve with the highest number of decisions made in a quarter since reporting began. As with the previous quarter, the rate at which applications are being processed has also increased resulting in an overall reduction in the total number of live applications. The upward trajectory in respect of processing Transferring Qualified Lawyer applications continues with the highest number of applications decided in a quarter since records began. By the end of the first half of 2025/26 (i.e. by the end of Quarter 2), more Transferring Qualified Lawyer applications have been decided than for the entirety of 2024/2025. The target reduction for the TQL backlog agreed with the Board has been exceeded (with over 50% of applications now processed), and the newer "flow" applications are also being progressed.
8. Notwithstanding the improved performance and the reduction in the overall number of applications, the number of TQL applications remains high following the March spike and the average number of applications received continues at the same steady flow as seen in Quarter 1 (and pre-March 2025 levels).

**Annex**

2025-26 Quarter 2 Performance report - balanced scorecard.

## 2025-26 Quarter 2 Performance report – Balanced scorecard

### 2025/26 Performance against KPIs to date

KPI	2025/26 volume to date	Target %	Target met	2025/26 performance to date	Improvement needed to meet target	Change on previous year	Previous year's performance	Quarter 2 Performance
<b>Quality</b>								
CAT Quarterly Audit	71 reviews completed	95%	●	98.6%		↘	98.9%	96.3%
CAT Requests for Review	34 reviews completed	95%	●	100.0%			100.0%	100.0%
I&E Quarterly Audit	4 reviews completed	95%	●	100.0%			100.0%	100.0%
I&E Requests for Review	3 reviews completed	95%	●	100.0%			100.0%	100.0%
I&E Administrative Sanction Appeals		0%						
I&E DT Decision Appeals	5 appeals concluded	0%	●	0.0%			0.0%	0.0%
Authorisations Quarterly Audit	28 reviews completed	95%	●	100.0%		↑	98.1%	100.0%
Authorisations IDB Reviews	6 reviews completed	95%	●	83.3%	11.7%	↘	93.3%	100.0%
Supervision Quarterly Audit	5 reviews completed	95%	●	100.0%			100.0%	100.0%
<b>Timeliness</b>								
CAT General Enquiries	533 queries closed	85%	●	95.9%		↘	96.7%	93.1%
CAT Reports & Other	1021 reports closed	80%	●	60.9%	19.1%	↘	68.4%	60.6%
I&E Investigations	45 investigations decided	80%	●	68.9%	11.1%	↑	56.5%	59.1%
Authorisations Applications	721 applications decided	80%	●	65.6%	14.4%	↑	55.8%	65.7%
<b>Service</b>								
CAT Calls	3996 calls received	85%	●	90.3%		↑	85.5%	90.8%
Authorisations Calls	4321 calls received	85%	●	68.3%	16.7%	↑	68.2%	69.1%
All Teams Complaints	27 complaints closed	95%	●	96.3%		↑	83.3%	93.3%
<b>Productivity</b>								
CAT General Enquiries Workload	2 open queries	85%	●	100.0%			100.0%	100.0%
CAT Reports & Other Workload	411 open reports	80%	●	60.1%	19.9%	↓	78.6%	60.1%
I&E Investigations Workload	155 open investigations	80%	●	72.3%	7.7%	↘	73.2%	72.3%
Authorisations Applications Workload	994 open applications	80%	●	19.1%	60.9%	↓	36.9%	19.1%

KPI	Target %	Target met	2025/26 performance	Change on previous year	Previous year's performance
People - Turnover (Voluntary)	12%	●	6.9%	4.4%	2.5%

KPI	Target [days]	Target met	2025/26 performance	Change on previous year [days]	Previous year's performance
People - Sickness absence	6	●	4.3	-0.6	5.0

● - KPI met or exceeded

● - Performance within 10 percentage points of target

● - Performance more than 10 percentage points lower than target

↑ - Performance increased compared to previous period

↘ - Performance decreased by 10 percentage points or less compared to previous period

↓ - Performance decreased by more than 10 percentage points compared to previous period

**No arrow** - Performance the same as for the previous period; or there is no applicable data for one of the comparable periods

**People - Turnover:** Rolling average for the previous 12 months, as of the end of the reported quarter. Compared to the rolling average for the previous fiscal year.

**People - Sickness absence:** Rolling average for the previous 12 months, as of the end of the reported quarter. Compared to the rolling average for the previous fiscal year.

## Quarter 2 volumes of work

- The summary below shows the number of cases and applications received and closed during Quarter 2, with Quarter 1 figures provided for comparison. For Investigations and Enforcement, the closures refer to the number of investigations decided. For Authorisations, the subtotals for applications decided and withdrawn are also included.

	General Enquiries	Reports	Investigations	Applications	
Received	266 Q1 2025/26: 255	567 Q1 2025/26: 576	30 Q1 2025/26: 27	256 Q1 2025/26: 311	Received
Closed	269 Q1 2025/26: 258	572 Q1 2025/26: 456	22 Q1 2025/26: 23	451 of which decided: 405 of which withdrawn: 46 Q1 2025/26: 374	Closed

## Summary headlines

- After the first six months of 2025/26, 13 of the 21 annual KPI targets are on course to be met, with another narrowly missed.
- There has been an improvement in six of the thirteen measures for which comparisons with the previous year are available. These improvements cover three areas of the balanced scorecard.

## Key points

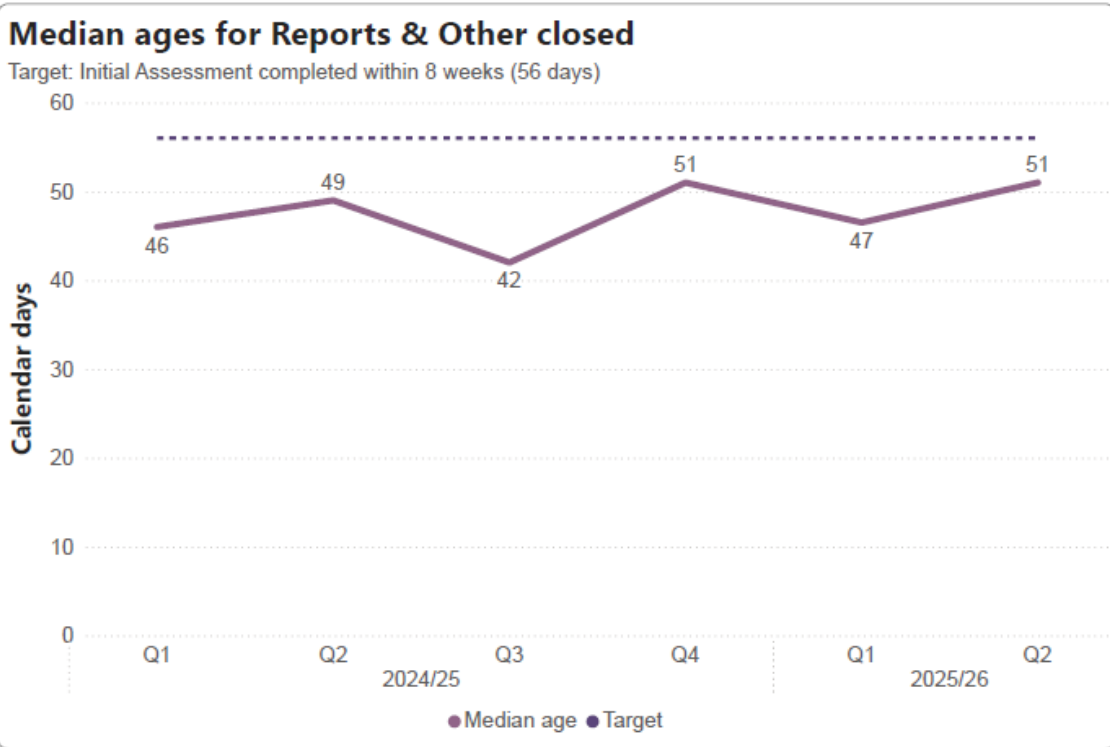
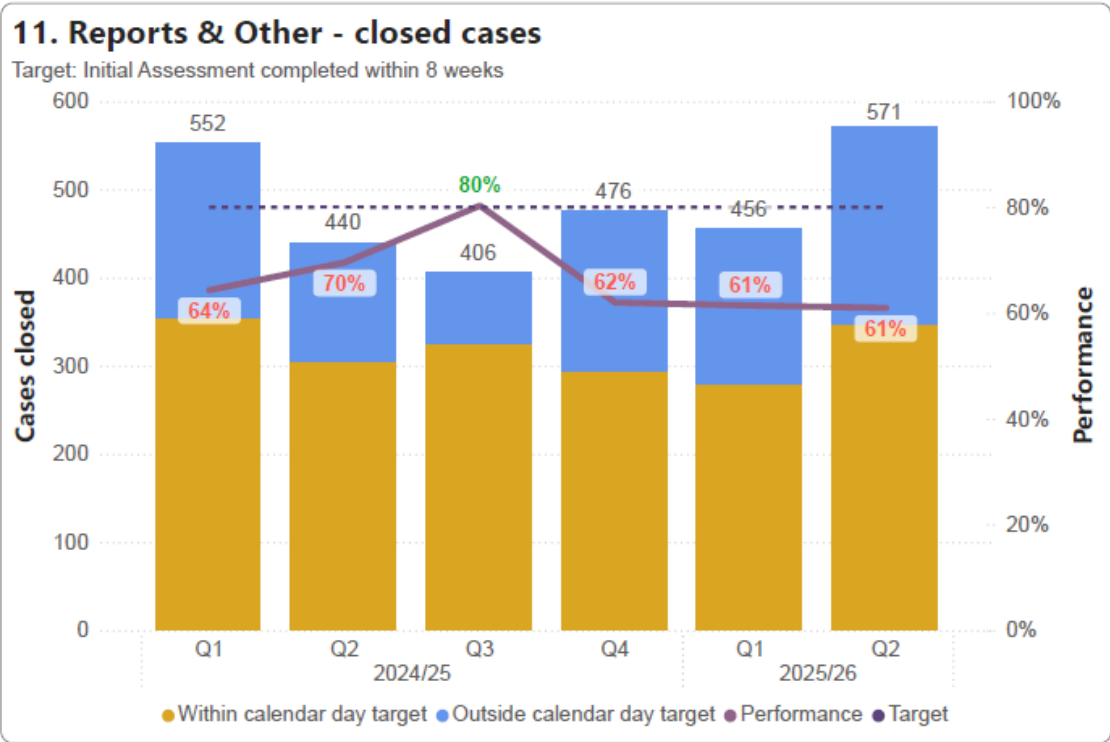
- All applicable Quality targets for the four Teams are on track to meet the annual targets except IDB Reviews for Authorisations (where only six reviews have been completed). There have been no appeals of administrative sanctions this year.
- The Productivity and Timeliness performance for General Enquiries has remained high.
- Almost 570 reports were opened in Quarter 2: in the first half of the year the number of reports received was up 24% on the equivalent period in 2024/25. Nevertheless 572 reports were assessed in Quarter 2, so ensuring live caseload remained stable.
- The higher volume of reports has resulted in a commensurately higher volume of referrals for investigation: Quarter 2 shows the highest number of cases referred to the Team since Quarter 1 2024/25.

8. Timeliness performance for Investigations is currently higher than in 2024/25, although the output is lower than the number of new referrals, leading to the sustained increase in the live workload.
9. Timeliness performance for Authorisations applications decided has improved and the output has continued to increase. There have been over 50% more decisions in the first half of 2025/26 than in the same period last year and the total number of decisions made for this quarter is the highest as compared with any other quarter since 2021.
10. CAT and Authorisations telephone calls performance increased.
11. Both People KPIs are within target, and there has been a slight reduction in the sickness absence. Whilst the turnover rate has increased to 6.9%, it is still well below the target of 12%.

## **Quality**

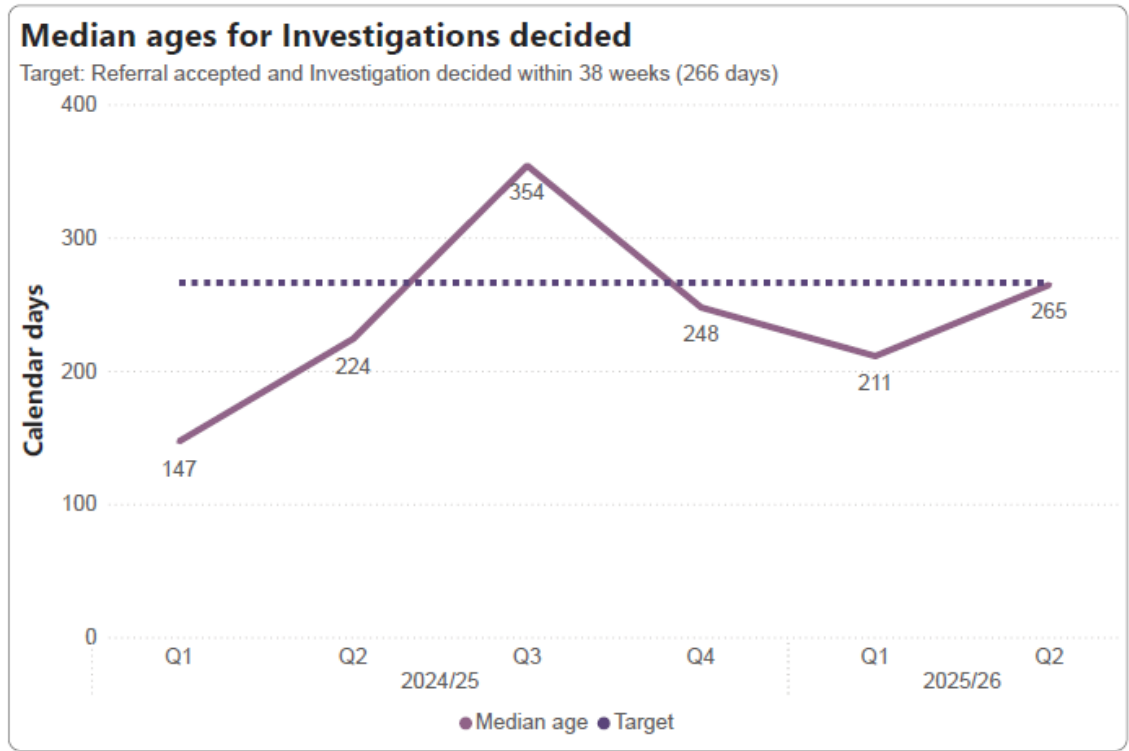
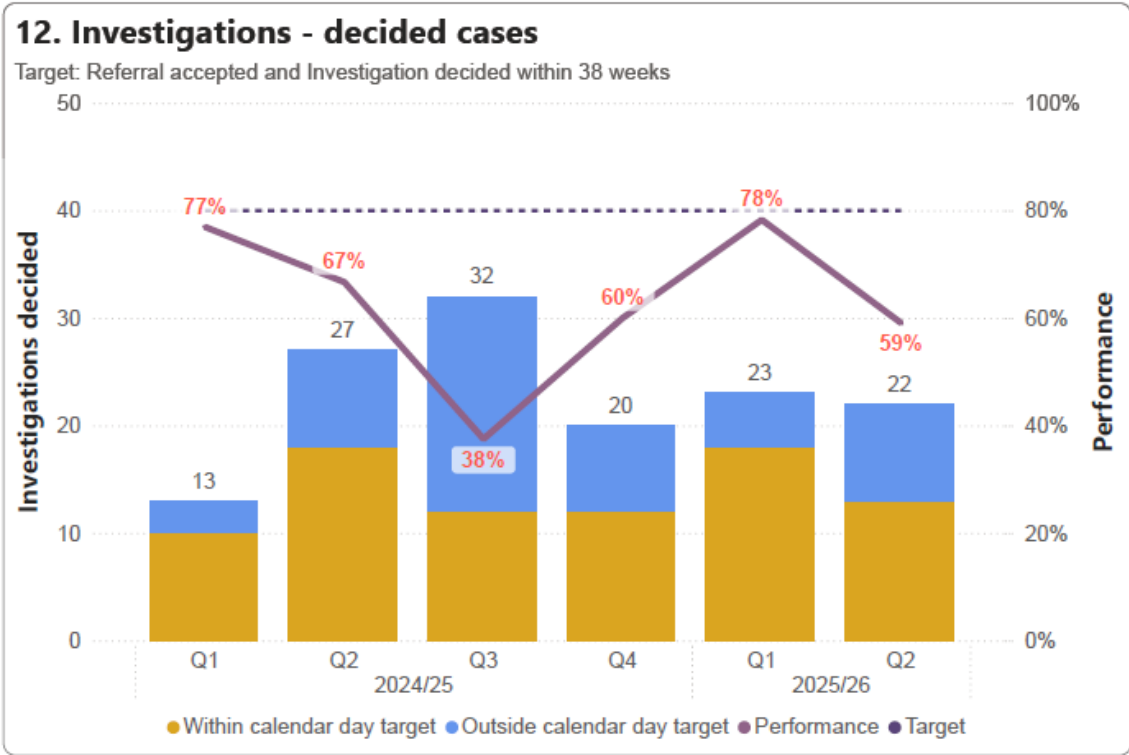
12. The annual target for quality of decision making for authorisations using IDB reviews is 95%. In Quarter 2 Authorisations were 83%. This is because of a review that was completed in Quarter 1 by IDB in which the IDB confirmed that there was no error in process and that Authorisations had applied the correct rules. However it was a case where the IDB differed in its interpretation of the entirety of the evidence.

Timeliness and Median ages

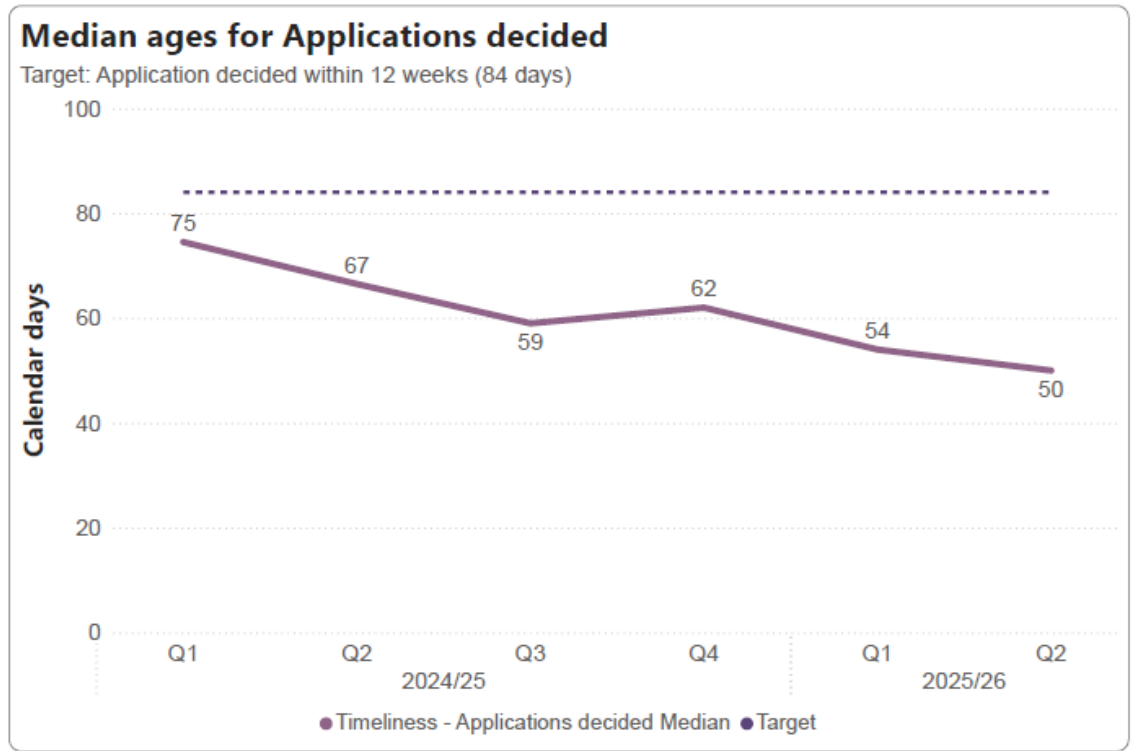
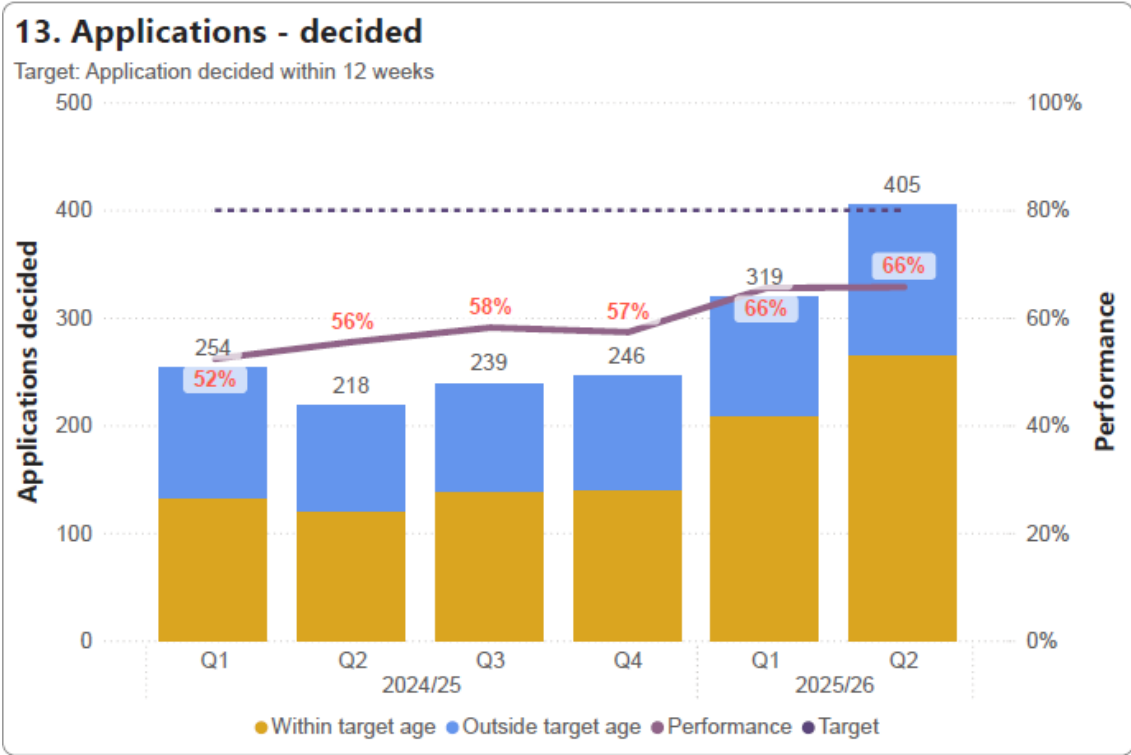


- 13. The number of Reports closed in Quarter 2 was the highest in the last two years, whilst Timeliness performance kept steady during 2025/26 but below the target.
- 14. The median age in calendar days of closed reports increased by four days, but is still below the target of 8 weeks (56 days).



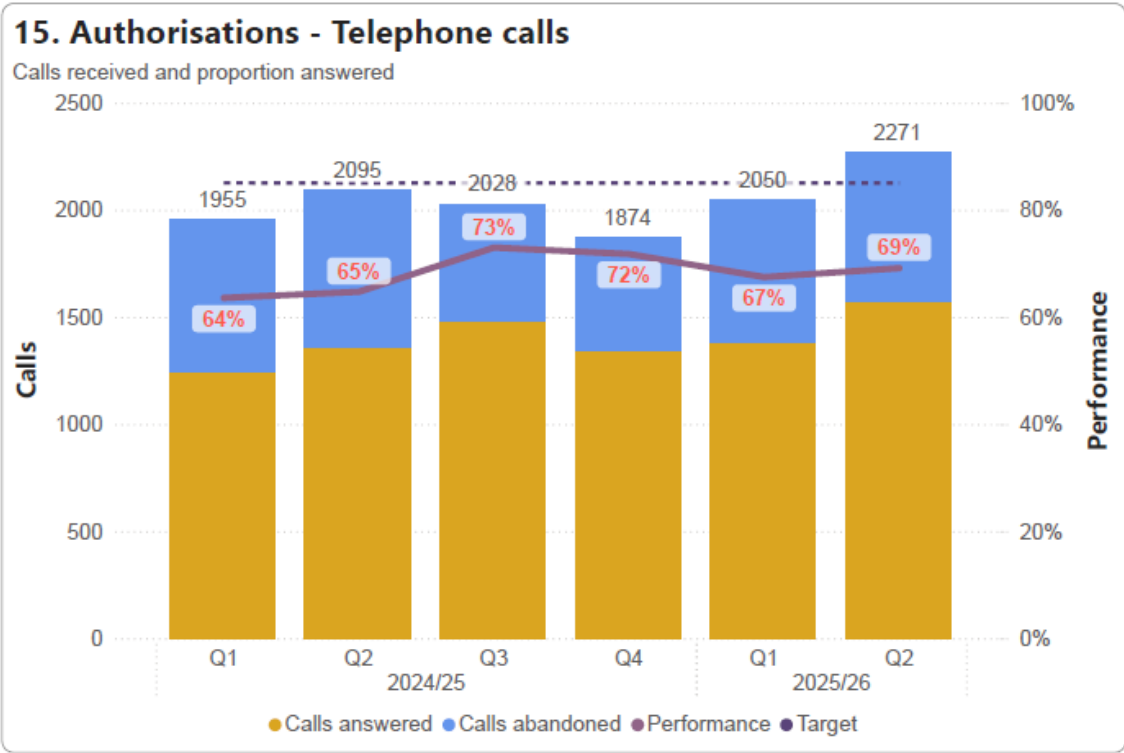


15. The annual performance so far for investigations decided in 2025/26 is 69%, compared to the performance of 57% in 2024/25. In Quarter 2, the median age of decided investigation cases increased but it is still within the target of 38 weeks.

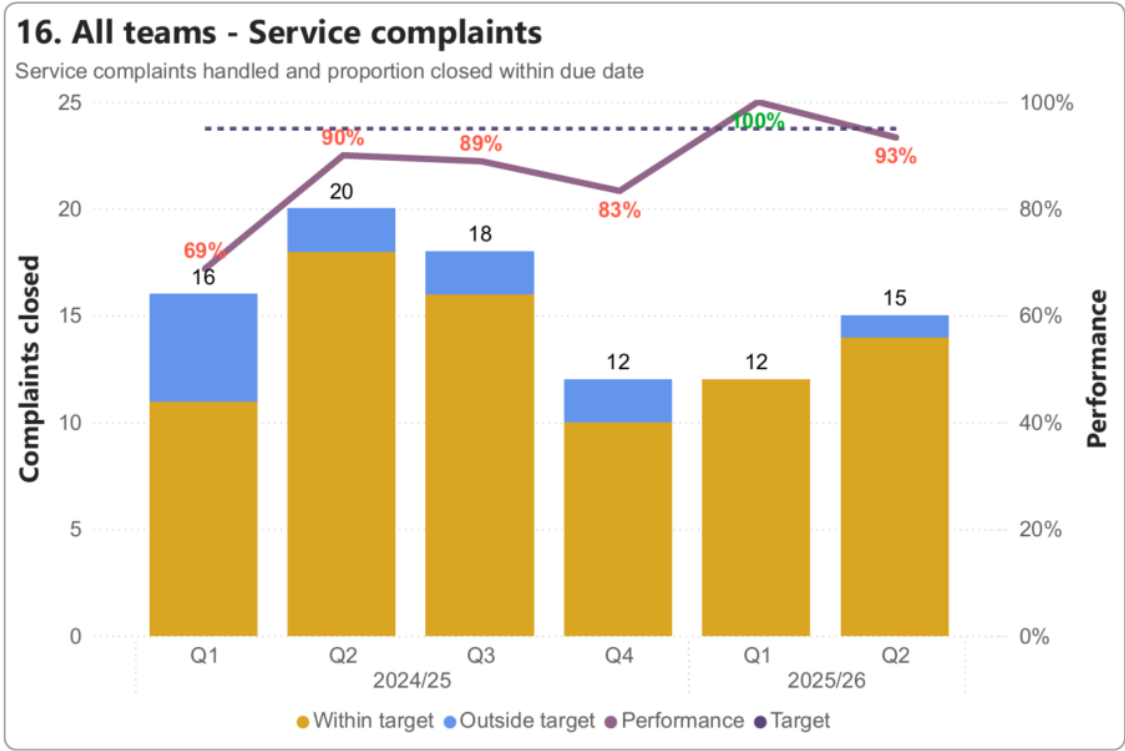


16. Output for Authorisations continues to improve, with more than 400 applications decided in Quarter 2 (the highest for any quarter ever recorded since reporting began). The increase was as a result of more Transferring Qualified Lawyer applications being decided compared to the previous quarters.
17. Timeliness performance also improved – for 2025/26 so far 66% of applications have been decided within 12 weeks, compared to 56% across 2024/25. The median age of applications decided also reduced by four days from the previous quarter.

Service

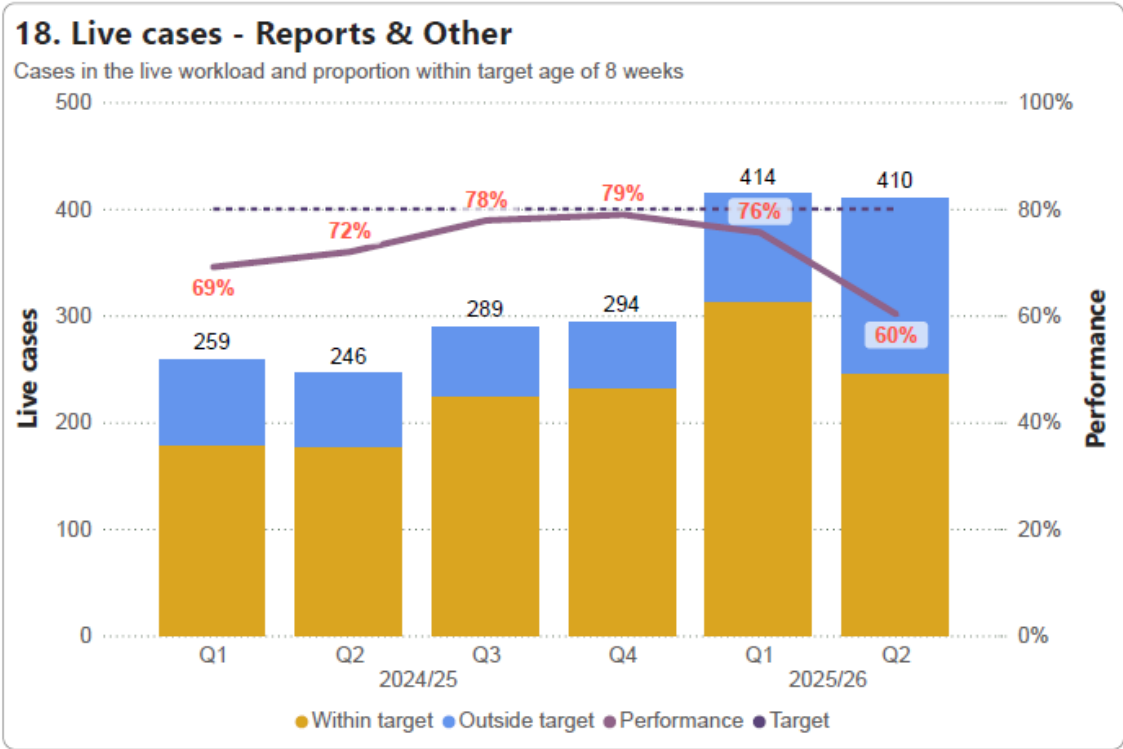


18. The Authorisations Team received more calls in Quarter 2 than in the previous six quarters, and a higher number of calls were also answered. Notwithstanding this increase, the performance measurement for Quarter 2 remains at a similar level to the annual average of around 68% of calls answered each year because calls received outside of Authorisations’ advertised service operating hours cannot be excluded from the performance measurement (these are therefore included in the “calls abandoned” figure) which “skews” the overall KPI.
19. The increase in calls in Quarter 2 is likely to be due to the seasonal peak in pupillage administration as pupils and their provider are following up on requests for new pupillages to be registered or current pupillages to be signed off.

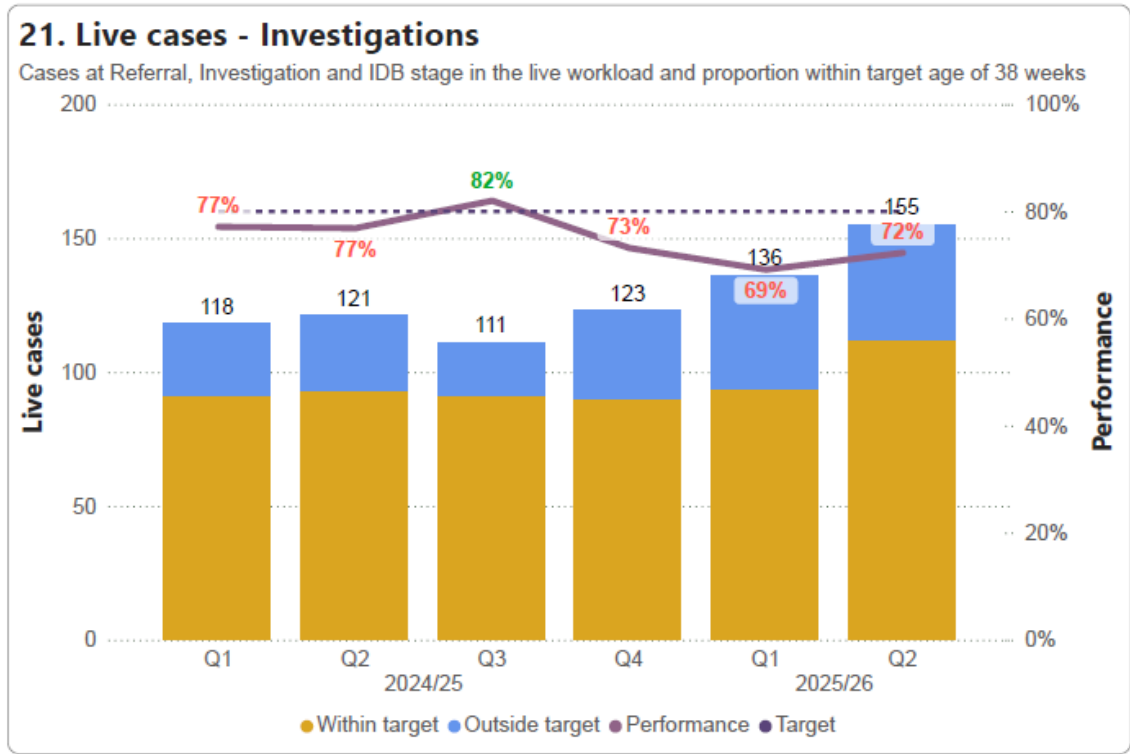


20. The KPI for Service complaints has been met in 2025/26 so far, with an overall performance of 96%.

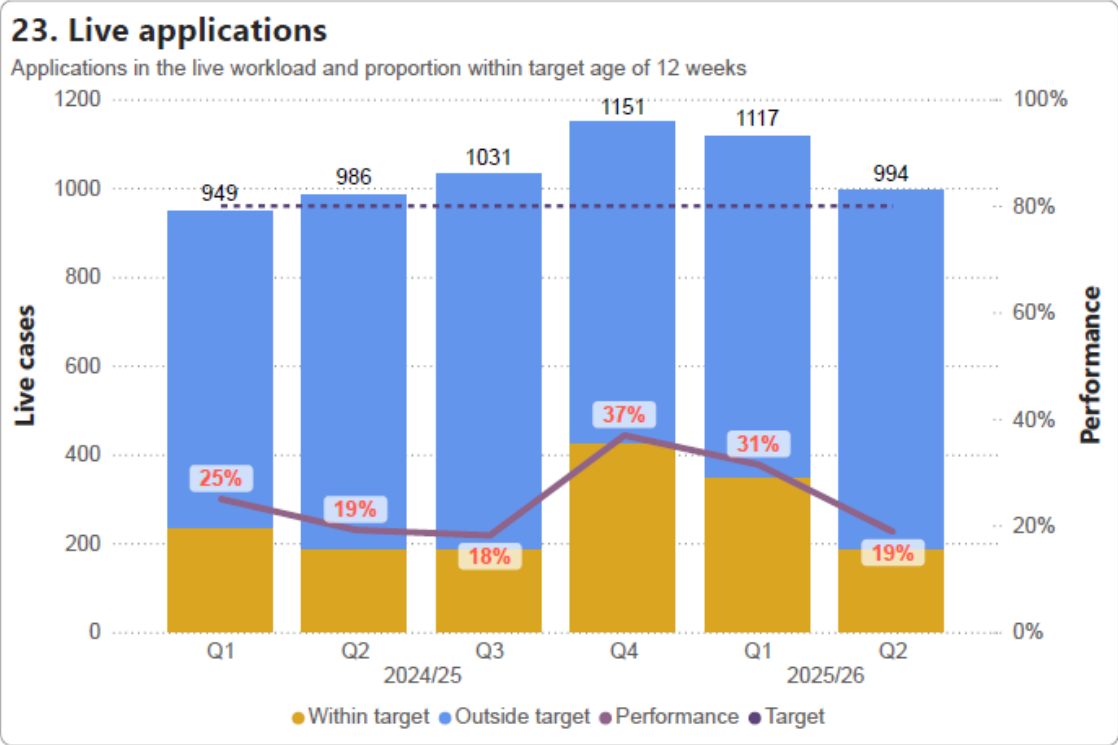
**Productivity**



21. At the conclusion of Quarter 2, 60% of open reports were within the target age. This is a lower proportion than the previous quarters and is explained by the significant increase in workload since the beginning of 2025/26, resulting in the highest number of live reports in the last four years.

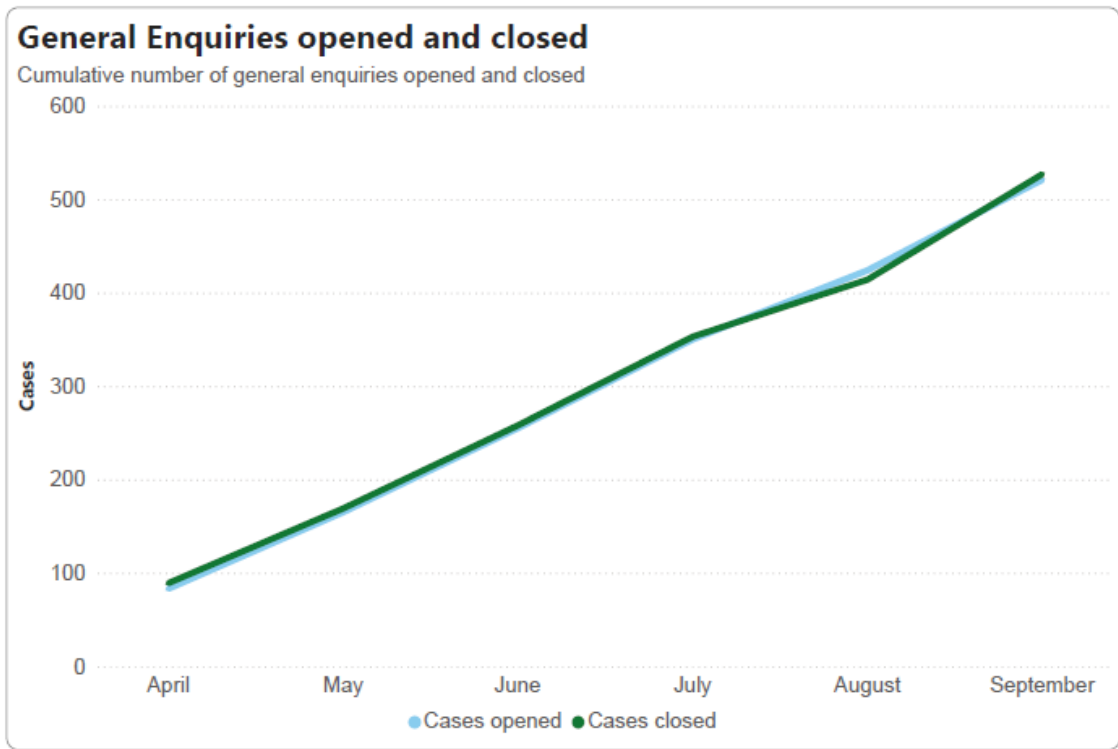


22. The Investigations workload continues to increase, mostly driven by the continued high referrals rate from the Contact and Assessment Team (reflecting the increase in reports received). The number of referrals received in Quarter 2 was the highest since Quarter 1 2024/25. As a result of this influx of younger cases, the proportion of the live workload within the target age of 38 weeks has increased to 72%. However the number of investigations outside this target age has also increased.

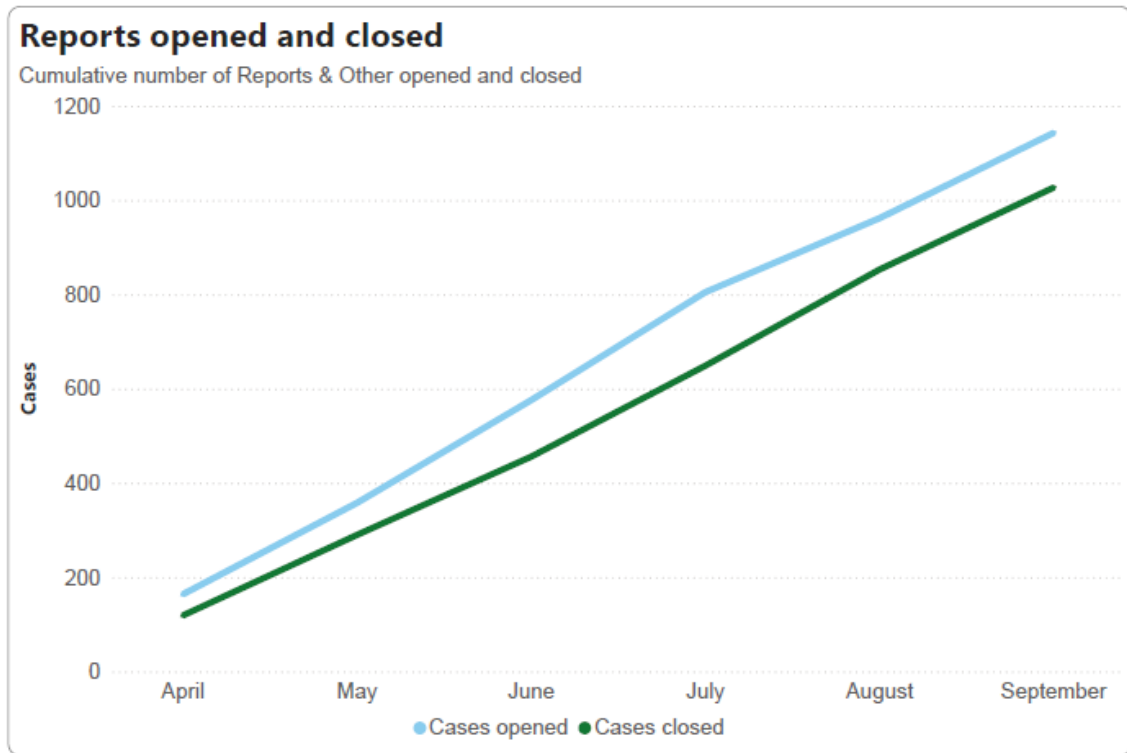


23. Despite the highest increase in the number of applications processed by the team in any quarter since 2021, the increase in productivity is not reflected in this KPI because the proportion of applications that are older than 12 weeks has increased. This age profile reflects the fact that the high number of Transferring Qualified Lawyer applications which were received in March 2025, which account for approximately 15% of the overall workload, are now over the target age of 12 weeks.

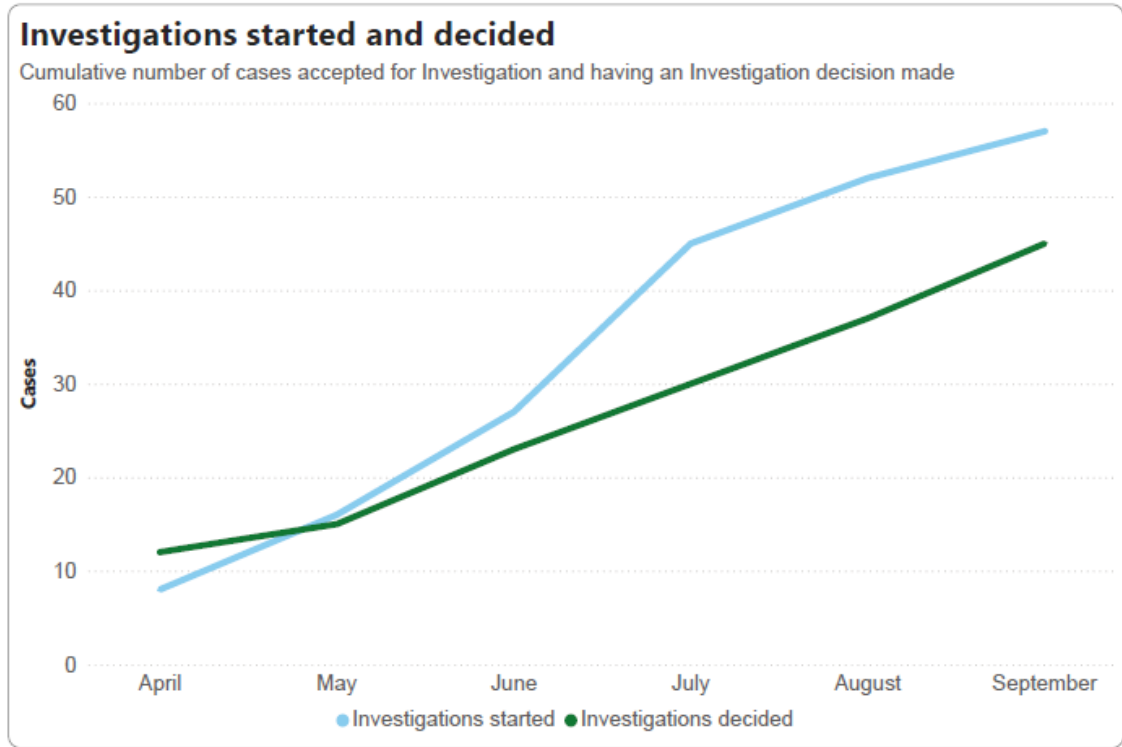
Cumulative opens and closures



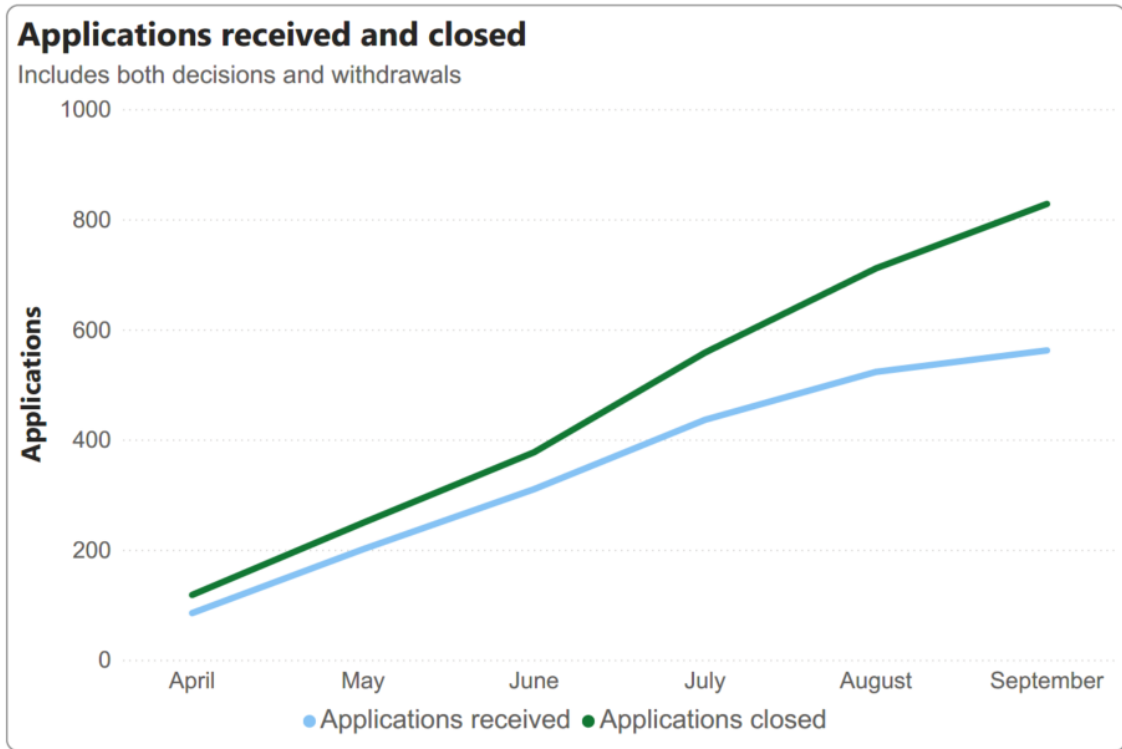
24. For the Contact and Assessment Team, the running total number of General Enquiries closed continues to closely track the number opened. The team is able to keep this workload to low single figures and to close the vast majority within the target time of one week.



25. For the first half of this year, the cumulative total number of CAT reports opened has exceeded the number closed, leading to a higher live workload. The number of reports received, over 1100, is 24% higher than the number received in the first half of the previous year.

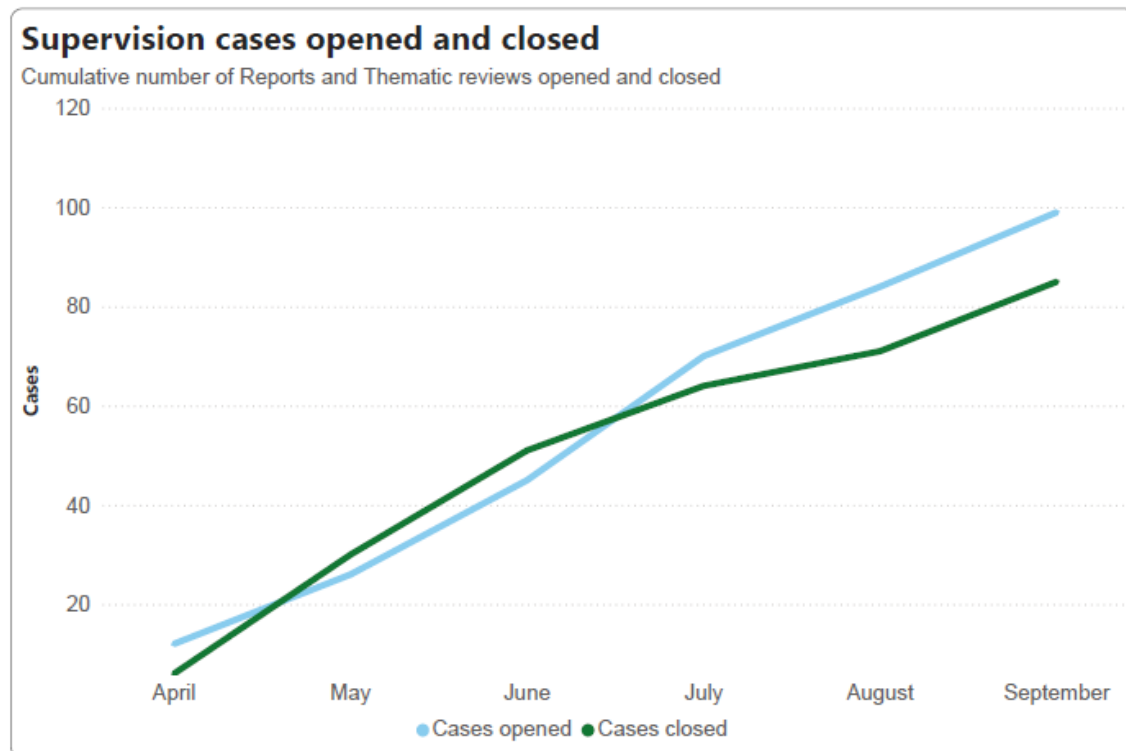


26. The cumulative total number of Investigations started has outpaced those decided during most of the year, leading to a continuous increase in the live workload. This is because of the higher number of referrals from the Contact and Assessment Team, as the number of investigations being closed remains at a similar level as previous years.



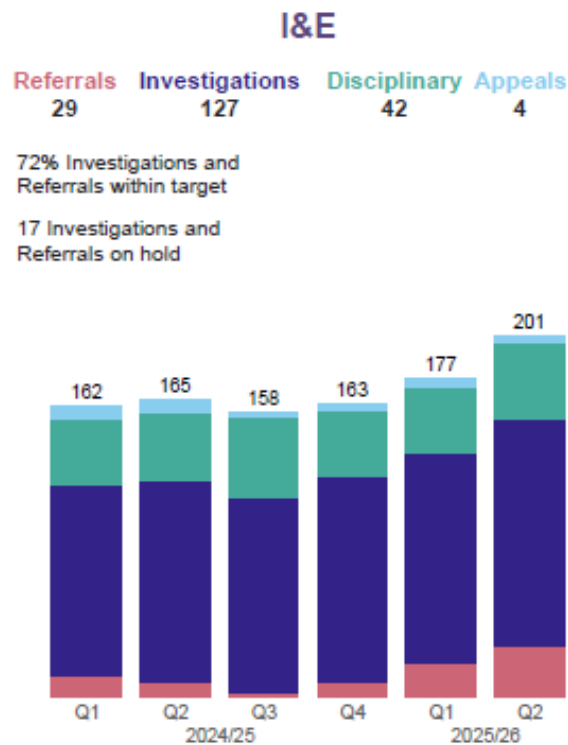
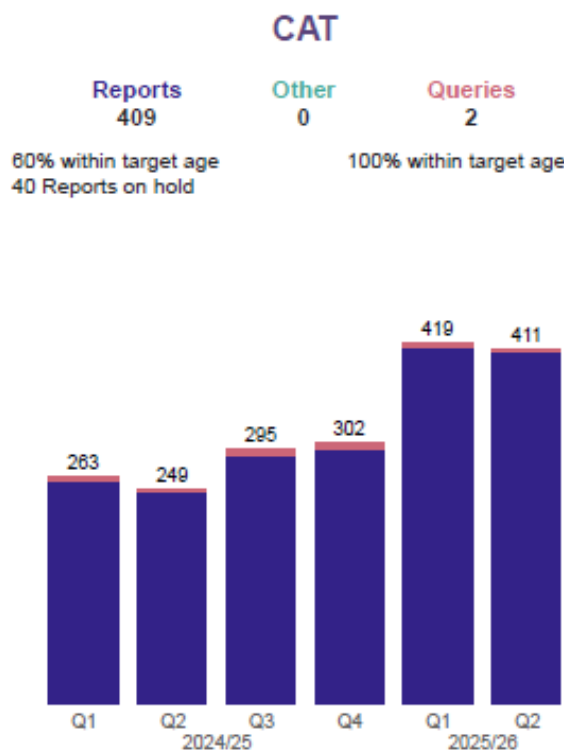


27. Authorisations applications determined continue to outpace the applications received, with a widening gap between the two during the summer which has led to a decrease in the overall workload. The number of applications decided in the first half of the year, 724, is 53% higher than the number of decisions in the equivalent period in 2024/25.
28. TQL applications account for 27% of the total applications received so far during 2025/26 and for 40% of the applications decided in the same period.

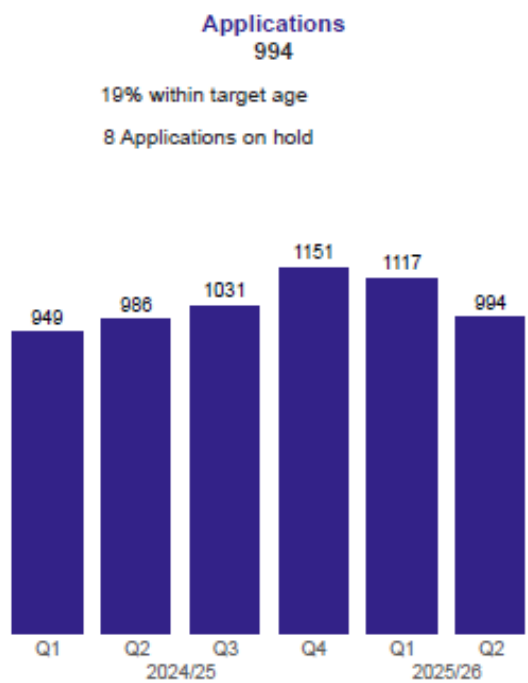


29. The number of cases opened in Quarter 2 outpaced the number of closures for Supervision for the year to date. Both Reports and Thematic Reviews are captured in this chart, and this increase in the cases opened is driven by the higher number of referrals from the Contact and Assessment Team - 39 in total in Quarter 2, the highest since records began.

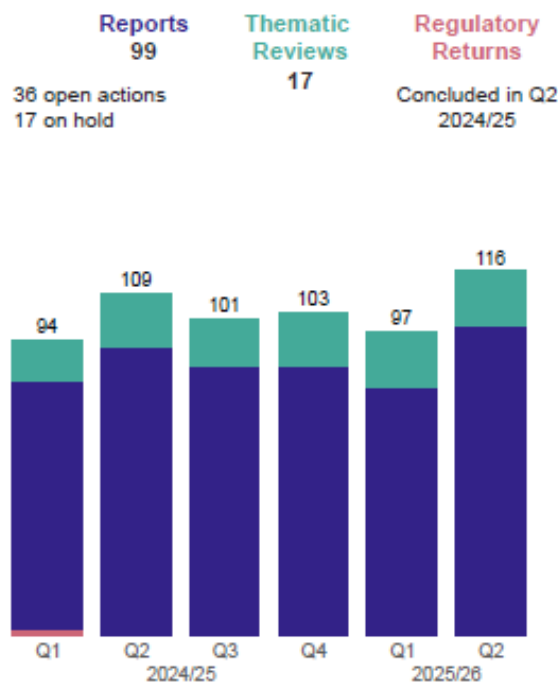
Team workloads



Authorisations



Supervision



## **Key points**

30. Caseloads have increased for the Investigations & Enforcement and Supervision Teams, whilst they remained steady for the Contact and Assessment Team. Authorisations is the only Team that shows a significant reduction in the workload.

## **Contact and Assessment Team**

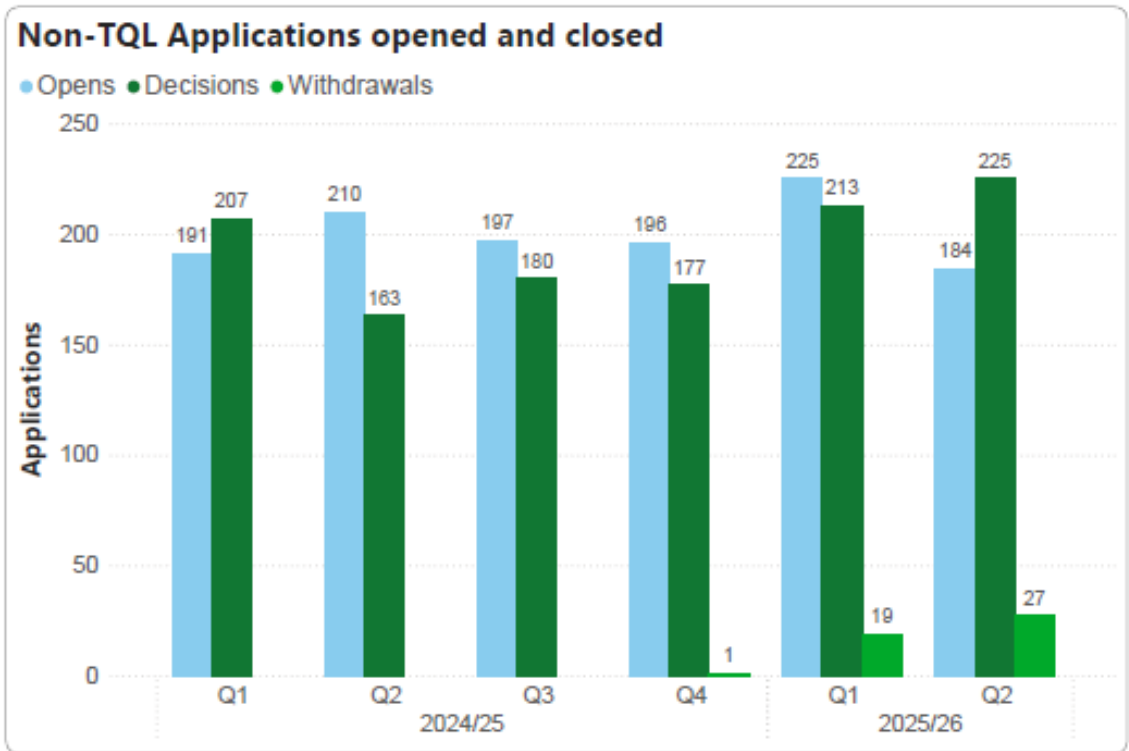
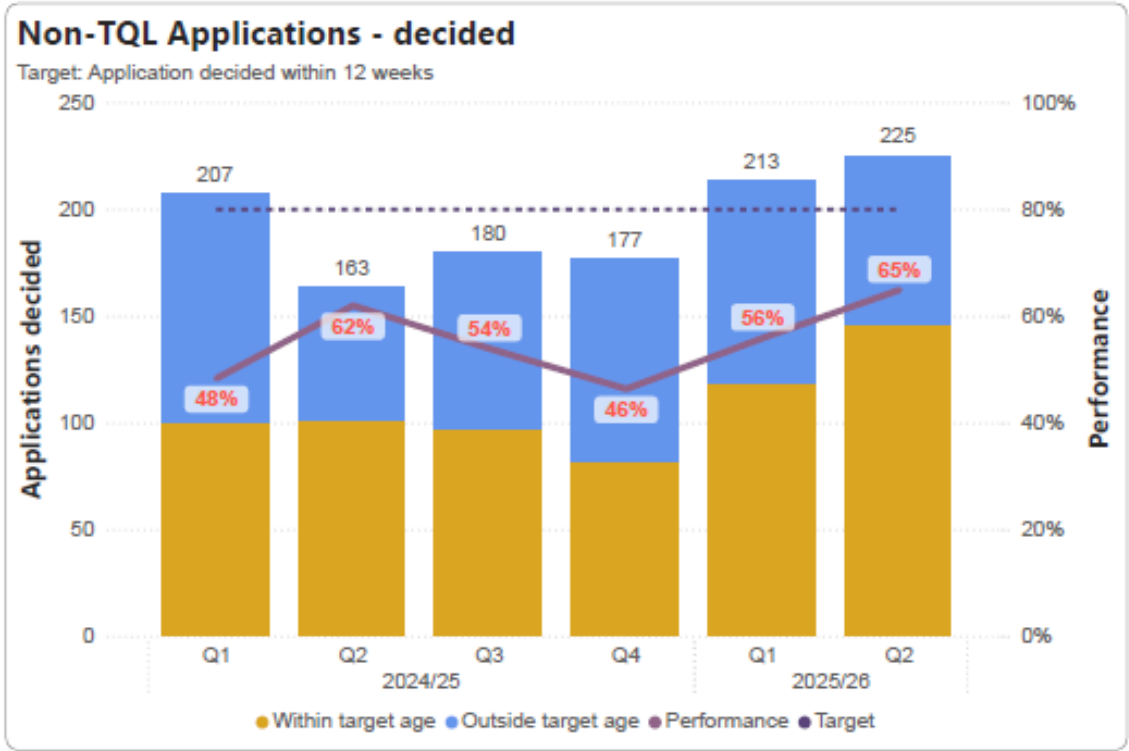
31. The caseload has remained steady during 2025/26, but at a level well above that seen last year.
32. In Quarter 2 the Team referred a total of 43 cases to the Investigations and Enforcement Team, up from 37 in Quarter 1, and 39 cases were referred to Supervision, up from 31 the previous quarter. In total, these referrals were 12% of all cases closed by the Team which is consistent with previous quarters.

## **Investigations & Enforcement**

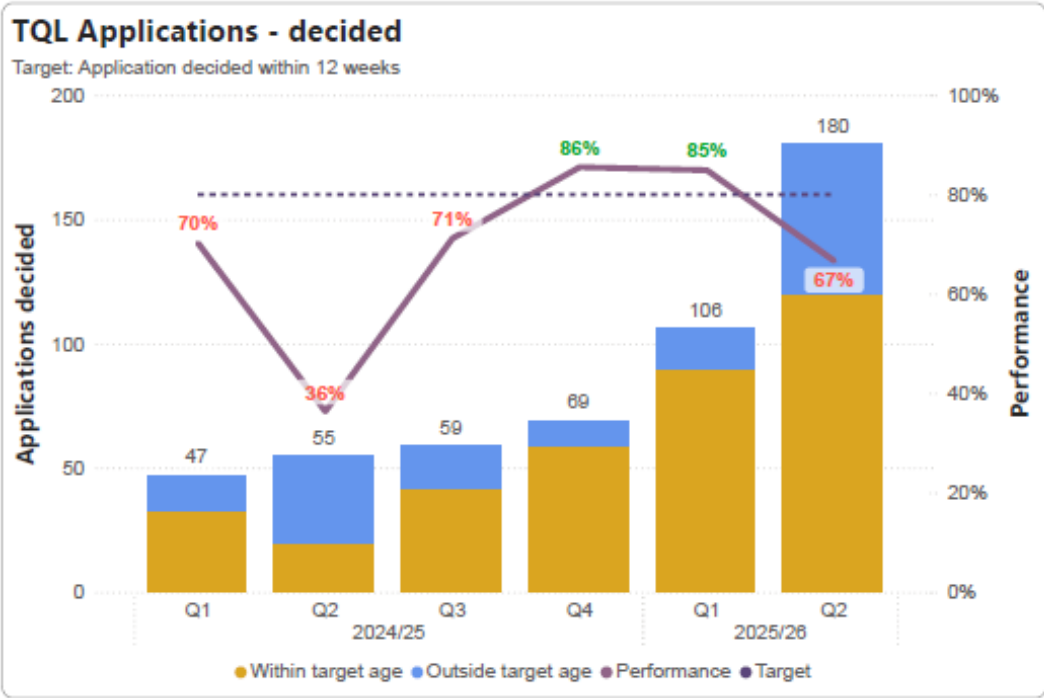
33. The overall workload has increased month by month during 2025/26, especially in the second half of Quarter 2 because of the high number of referrals from CAT and a slower pace of investigation decisions.
34. The number of cases at Disciplinary Stage increased during Quarter 2 – five cases were closed at Disciplinary Tribunal stage and eleven new ones were opened. This increase from Quarter 1 reflects the impact of difficulties listing over the summer period. The total number of cases at the tribunal stage is slightly higher than at the same point last year, (41 as opposed to 37). For Quarter 3, cases are already listed at a higher frequency than in Quarter 2. Providing these listed cases are effective then there should be more cases tribunal cases closed next quarter.
35. No Determination by Consent cases were closed.

## **Authorisations**

36. The total Authorisations workload reduced by more than 10% in Quarter 2 due to an increase in the rate at which applications are being processed by the Team (as compared with applications received).
37. The number of non-TQL applications decided increased from the previous quarter, reaching the highest number of the last four years.

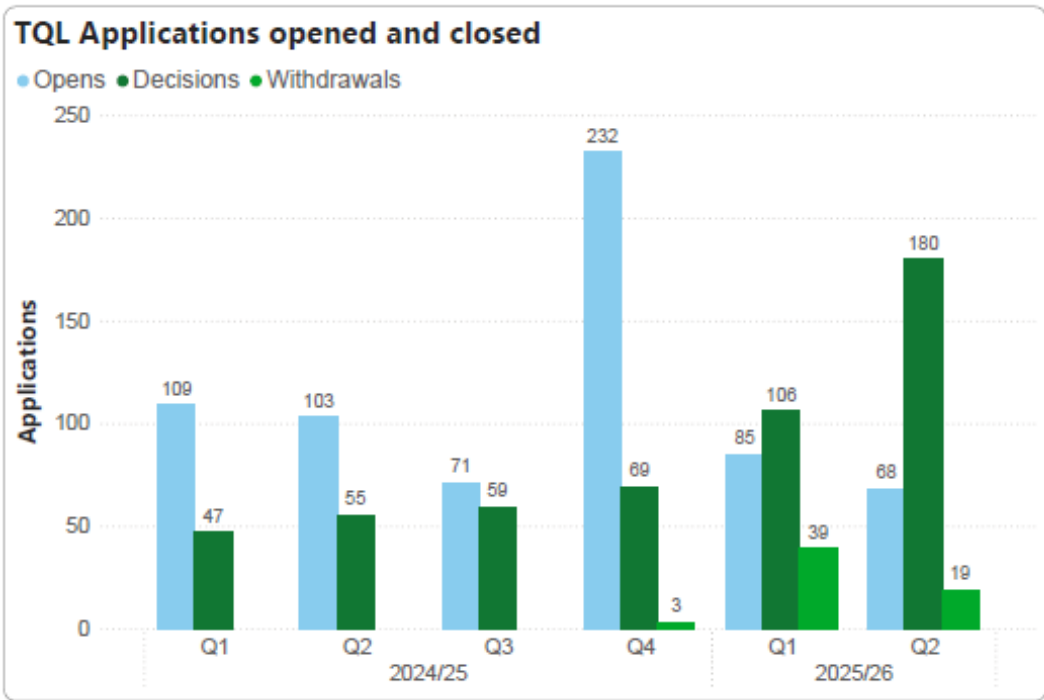


38. Output greatly increased for TQL applications in Quarter 2, following an already productive Quarter 1, with the highest number of applications decided in a quarter since records began. The Team have decided more TQL applications in the first half of 2025/26 (286) than in the whole of 2024/25 (230).



39. Over the last two years the number of TQL applications received each quarter has gradually reduced, with the exception of the March 2025 spike, and this continued in Quarter 2.
40. Pupillage tasks increased during the latter part of Quarter 2 after the seasonal minimum in Quarter 1. The Team has been handling the pupillage completion tasks in August/September, prior to the next sign-off peak due in Quarter 3, alongside continuing BAU work.

### Supervision



41. The number of Supervision cases opened relating to reports to the BSB in Quarter 2 is higher than the previous quarters in the last two years.
42. This has been driven by a higher number of referrals from the Contact and Assessment Team which led to an increase in the workload.
43. In Quarter 2, fewer Thematic Reviews were opened compared with previous quarters. Supervision opened six cases relating to the ongoing programme of testing compliance under the Money Laundering Regulations.
44. The number of Reports closed was 27, down from 43 in Quarter 1, and the lowest since Quarter 2 2024/25. The closure rate will naturally fluctuate with the nature of ongoing risk that is being actively monitored before officers are satisfied that closure is appropriate. All open cases are actively monitored with active engagement with case subjects. The rate and number of closures is broadly consistent with 2024/25 for the year to date.
45. One visit took place during Quarter 2.

## **Appendices**

- Appendix 1: Overview of all metrics and KPI targets.
- Appendix 2: Definitions (explaining how targets are calculated).
- Appendix 3: Types of case.

<b>Meeting:</b>	Board	<b>Date:</b>	27 November 2025
<b>Title:</b>	Annual Report 2024/25		
<b>Authors:</b>	Director General /Graham Black		

<b>Paper for:</b>	<b>Decision: X</b>	<b>Discussion</b>	<b>Noting</b>	Other: <input type="checkbox"/> (enter text)
-------------------	--------------------	-------------------	---------------	--

Paper relates to the Regulatory Objective (s) highlighted in bold below	
(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
(f)	encouraging an independent, strong, diverse and effective legal profession
(g)	increasing public understanding of citizens' legal rights and duties
(h)	promoting and maintaining adherence to the professional principles
(i)	promoting the prevention and detection of economic crime.
<input type="checkbox"/>	Paper does not principally relate to Regulatory Objectives

## Summary

1. This paper covers the draft of the Bar Standards Board's Annual Report for 2024/25 the final year of the Strategic Plan 2022-25. For the first time, the Annual Report brings together in one document our reporting on regulatory casework and on Bar training to provide a comprehensive overview of our work and impact in the public interest.

## Recommendations

2. The Board is invited to approve the draft Report for publication.

## Commentary

3. The Bar Standards Board publishes an Annual Report setting out what we delivered, and the regulatory impact we achieved, in the preceding year. It differs from a typical annual report because it does not include audited financial statements. That reflects the Bar Standards Board's status as an operating arm of the General Council of the Bar. The Report does, however, contain summary information on the Bar Standards Board's spending and income in the past year.
4. As in preceding years, we have structured the draft annual report as a commentary on how far we fulfilled the commitments we made in the Business Plan for 2024/25<sup>1</sup> published in March 2024. Accordingly, under each of the principal strategic priorities of *efficiency, standards, equality, access and independence* we have set out what we promised in the business plan, what we actually delivered and, for the first time, an assessment of the regulatory impact of our work.

<sup>1</sup> <https://www.barstandardsboard.org.uk/resources/press-releases/the-bar-standards-board-publishes-its-2024-2025-business-plan.html>

**Part 1 - Public**

5. We have, however, made one significant change to our reporting. In the last three years, we have published separate reports on regulatory casework (known as the Regulatory Decisions report<sup>2</sup>) and on Bar training<sup>3</sup>. We judge that this fragmented reporting has detracted from a coherent view of our work and impact. Accordingly, we have brought all the reports together for the first time in reporting on 2024/25 to provide a comprehensive, unified overview of our work.
6. We are publishing separately statistical reports on Bar training enrolments, results and progression and on regulatory casework.

**Annex**

7. Annex A - Annual Report 2024/25

---

<sup>2</sup> <https://www.barstandardsboard.org.uk/resources/press-releases/bsb-publishes-its-2023-2024-regulatory-decision-making-annual-report.html>

<sup>3</sup> <https://www.barstandardsboard.org.uk/resources/press-releases/bsb-publishes-its-annual-report-to-the-board-on-bar-training-and-a-report-on-bar-training-statistics.html>



BAR  
STANDARDS  
BOARD

REGULATING BARRISTERS

# Annual Report 2024-2025

If you would like a version of this publication in an alternative format, please contact the Equality and Access to Justice (E&AJ) Team by telephone on 020 7611 1305 or: [equality@barstandardsboard.org.uk](mailto:equality@barstandardsboard.org.uk)

The Bar Standards Board regulates barristers and specialised legal services businesses in England and Wales in the public interest.



# Foreword

## by the Director General of the Bar Standards Board, Mark Neale



In my foreword to the Bar Standards Board's [Business Plan for 2024/25](#), I said that our priority for the year would be to continue the BSB's evolution as an active regulator able to identify and address risks to the public interest at the Bar. Key to this, I went on to say, was the operational effectiveness with which we deployed our principal regulatory functions of supervision, authorisation and enforcement.

I am pleased to be able to report, therefore, that across the year we improved or maintained our performance against all but one of our timeliness, productivity and service measures without impacting the continuing high quality of our decision-making. We recognise, however, we still have some way to go consistently to meet all our operational targets which are key to public and professional confidence in us as a regulator. We also want to ensure that we deploy these regulatory interventions promptly and proportionately to address emerging risks.

Accordingly, we established at the [beginning of 2024/25 a Reform Programme](#) with the three aims of:

- enhancing our capacity to capture and analyse intelligence to identify risks early;
- modernising the delivery of our regulatory functions, including to give effect to the recommendations of the independent [Fieldfisher review of enforcement](#), so that we can intervene promptly and proportionately, using the right regulatory tool for the job; and
- re-organising to clarify accountabilities and instilling a high performance culture which builds on the existing high level of engagement among our people.

We made good progress in implementing that programme during 2024/25. We established a new regulatory risk framework. We re-designed our end-to-end enforcement process and launched a consultation on the enforcement regulations which underpin the process. We re-organised to create departments with unified accountabilities for enforcement and for standards. We created a new department to strengthen and to join up our ability to plan our work and to deliver change. Though the full benefits of these reforms will not come through until 2026/27, we are already beginning to see further operational improvements and we entered into voluntary commitments with the Legal Services Board in Summer 2025 to sustain this momentum.

Our Business Plan for 2024/25 also highlighted that, despite encouraging gains in diversity among pupils and among newly-qualified barristers, addressing all forms of bullying, harassment and discrimination remains a vital objective. We welcome, therefore, the review of Bullying, Harassment and Sexual Harassment at the Bar by Baroness Harman KC and will work with the profession and other stakeholders to implement the Report's recommendations. In particular, we recognise our specific responsibility to accelerate the handling of sexual harassment cases and to improve our support for witnesses who will only come forward if they can be confident of a robust, transparent and responsive process.

Key to addressing the wider cultural challenges identified by Baroness Harman will be the role of chambers. Over the last two years, we have worked intensively with the profession to clarify the role which chambers can play in overseeing standards, equality and access. This culminated in the publication in February 2025 of [new web pages](#) consolidating our rules and guidance bearing on barristers' practice management responsibilities and linking to guidance on professional sites. The more effective chambers are in exercising their oversight responsibilities, the lighter the touch needed from the Bar Standards Board.

We have also continued to focus on the professional and ethical standards of barristers which will remain central to the public interest and to the Bar's international reputation and competitiveness. This is why we created in December 2024 a Regulatory Standards Department to oversee all aspects of how barristers acquire, demonstrate, apply and update their professional skills from qualification to retirement. Especially now, those standards do not stand still. Consumer expectations, new technologies and new ethical challenges will re-shape what the public expects of its barristers.

Ethical standards have been brought into sharp focus by the Post Office Inquiry. We shall not only pursue enforcement action against individual barristers whose conduct contributed to this miscarriage of justice, but also address systemic issues through our continuing work to revise our Code of Conduct.

We must see to it that, in delivering our regulatory functions, we consider the needs of those in vulnerable circumstances. Technology, especially artificial intelligence, offers an opportunity to improve access to legal services and to reduce their cost. In partnership with the profession, we are working to ensure that AI is adopted safely but productively.

We are now three years on from the adoption of our [current strategy](#), with its focus on: efficiency, standards, equality, access and independence. Looking forward we also want to take a longer term view by moving from a three year strategy to a strategy covering the next five years. Consulting on that new five year strategy to ensure that it takes into account the views of all our stakeholders will be a major priority for the coming year.

Finally, a word about the content of this Annual Report. We have taken the decision to incorporate into this report our previous reporting on regulatory decisions (covering March 2024 - April 2025) and on Bar training (covering September 2024 - August 2025 period). This is to provide a comprehensive overview of work in the past year.

# Introduction

In performing its regulatory functions, the Bar Standards Board has Regulatory Objectives which are set out in the Legal Services Act 2007. These are:

- protecting and promoting the public interest;
- supporting the constitutional principle of the rule of law;
- improving access to justice;
- protecting and promoting the interests of consumers;
- promoting competition;
- encouraging an independent, strong, diverse and effective legal profession;
- increasing public understanding of the citizen's legal rights and duties;
- promoting and maintaining adherence to the professional principles. These are that barristers should act with independence and integrity, maintain proper standards of work, act in the best interests of their clients, comply with their duty to the court to act with independence in the interests of justice, and keep the affairs of their clients confidential; and
- promoting the prevention and detection of economic crime.

The Board of the BSB seeks to ensure that in performing its regulatory functions, all the BSB's activities focus on those key regulatory objectives. Those activities include:

- prescribing the education and training requirements for becoming a barrister and for ensuring that barristers' skills are maintained throughout their careers;
- authorising businesses that focus on advocacy, litigation, and specialist legal advice;
- setting standards of conduct and taking action where it appears that they are not being met;
- monitoring the service provided by barristers and the organisations the BSB authorises to ensure they meet the BSB's requirements;

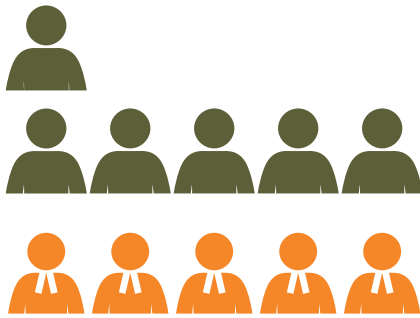
- assuring the public that everyone the BSB authorises to practise is competent to do so;
- promoting equality, diversity and inclusion at the Bar; and
- seeking to improve access to justice and supporting public legal education.

The BSB seeks to do this by taking a proportionate, risk-based approach to regulation. We monitor the market for barristers' services in order to identify the risks that could prevent the Regulatory Objectives from being met. We then focus our attention on those risks that we think pose the biggest threats to the public interest and take action to try to prevent those risks from occurring, or to reduce their impact.



# The BSB's year in numbers

## About us



Our Board has 6 lay members (including the lay Chair) and 5 barrister members



At 31 March 2025 we were responsible for regulating 18,005 practising barristers and around a further 60,918 barristers who were not practising (we regulated 17,656 practising and around 59,298 non-practising barristers in 2023-24)



We authorised 163 specialised legal services businesses in 2024-25 (compared with 145 in 2023-24)



**£18,453k**  
– our income in 2024-25  
**£18,193k**  
– our expenditure in 2024-25

(compared to income of £15,562k and expenditure of £15,525k in 2023-24)

## Bar training



**7,815**

students sat centralised exams in 2024-25 as part of their vocational Bar training (compared to 7,198 in 2023-24)



**634**

applications were submitted from solicitors, EU lawyers, overseas lawyers and legal academics wanting to transfer to the Bar in 2024-25 (compared to 586 in 2023-24)



**1,813**

applications were submitted for waivers and exemptions from the qualification rules set out in the BSB Handbook in 2024-25 (compared to 2,113 in 2023-24)



**389,986**

users visited our website in 2024-25 (compared to 305,000 in 2023-24)



**292,136**

page views of our Barristers Register in 2024-25 (compared to 253,000 in 2023-24)



**674**

pupils sat the centralised professional ethics exam in 2024-25 (compared to 454 in 2023-24)



**630**

new pupillages were registered, and 593 pupillages were signed off

## Regulating barristers



**1,859**

We received 1,859 new reports about the conduct of barristers (compared to 1,802 in 2023-24)

**9**

barristers were suspended

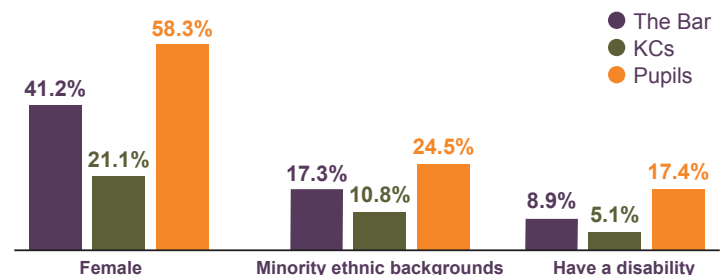
**10**

barristers were disbarred

(compared to 9 and 10 respectively in 2023-24)

## Promoting diversity at the Bar

Annual Diversity at the Bar Report, December 2024 (excluding non-responses)



# Regulatory Reform

Effective regulation depends on the capacity to identify risks to the public interest before they materialise and then to deploy a proportionate and effective regulatory intervention to manage those risks. The two things are complementary. Excellent insight without an effective regulatory response is powerless. Efficient regulatory functions without insight are undirected and may be disproportionate.

As we set out in our Business Plan for 2024/25, the Bar Standards Board was already engaged on reforms to enhance our approach to regulatory risk and to make better use of data and intelligence. Following the receipt in Spring 2024 of the independent report by Fieldfisher on our approach to enforcement, we broadened the scope of our Reform Programme to embrace the modernisation of our regulatory functions. We also recognised the need to build on the existing commitment of our people to build an agile, inclusive and high performance culture.

We took forward this Reform Programme throughout 2024/25, with the results described in the following sections of this Annual Report.

We also aim to clarify our approach to using our regulatory tools. A regulator has a range of interventions at its disposal: from the publication of research and guidance to raise awareness of issues; to proactive supervision to work with the profession, particularly chambers and employers, to achieve compliance and better outcomes; to enforcement action to protect the public and to deter misconduct. We are conscious that the profession will share many of the same objectives as the regulator. The promotion of a diverse profession is a good example. Our commitment, therefore, is to make maximum use of awareness raising and of supportive supervision to achieve shared objectives. We shall take enforcement action in a proportionate, consistent and targeted way where the public interest requires it.



# Strategic Aim 1 – Efficiency

## Overview

We said we would:

- implement the recommendations of the independent end-to-end review of our enforcement policies and processes led by Fieldfisher
- continue our review into our decision-making processes for authorisations;
- establish a new balanced scorecard for monitoring performance;
- design and launch a new Pupillage Self Service facility which will enable pupils to register and record their progress online via MyBar;
- extend online access to MyBar to entities; and
- review our regulatory fees to ensure that we are achieving full cost recovery.

We delivered:

- the re-design of the end-to-end enforcement process to provide for a more streamlined and efficient conduct of cases;
- the launch of consultations on changes to our regulations to support the new process and to make other improvements;
- the launch of a project to overhaul the supporting IT systems;
- a strategy for enhanced knowledge management to inform regulatory decision-making;
- a plan, currently on course, to clear the authorisation applications from transferring lawyers;
- the first year of a new balanced scorecard for operational performance covering the quality and speed of decision-making, productivity and service responsiveness;
- the launch of a project to deliver on-line registration for pupils; and
- the re-setting of all non-PCF regulatory fees to recover the Bar Standards Board's economic costs.

## Commentary: our performance and impact



### Casework Delivery – 2024/2025 Annual KPI performance

KPI	Target %	2024/25 performance	Change on previous year	2023/24 performance
<b>Quality</b>				
CAT - Quarterly Audit	95%	98.9%	0.4% ↑	98.5%
CAT - Requests for Review	95%	83.3%	-16.7% ↓	100.0%
Investigations - Quarterly Audit	95%	100.0%	0.0%	100.0%
Investigations - Requests for Review	95%	100.0%	25.0% ↑	75.0%
Investigations - Administrative Sanction Appeals	0%	-	-	-
Investigations - DT Decision Reviews	0%	0%	0%	0%
Authorisations - Quarterly Audit	95%	98.1%	-1.9% →	100.0%
Authorisations - IDB Reviews	95%	93.3%	23.3% ↑	70.0%
Supervision - Quarterly Audit	95%	100.0%	0.0%	100.0%
<b>Timeliness</b>				
CAT - General Enquiries-closed	85%	96.7%	2.0% ↑	94.7%
CAT - Reports & Other-closed	80%	68.4%	12.8% ↑	55.6%
Investigations - Investigations decided	80%	56.5%	1.2% ↑	55.3%
Authorisations - Applications-decided	80%	55.6%	-7.1% →	62.7%
<b>Service</b>				
CAT - Calls answered	85%	85.5%	8.1% ↑	77.4%
Authorisations - Calls answered	85%	68.2%	32.9% ↑	35.4%
All teams - Complaints	95%	83.3%	8.3% ↑	75.0%
<b>Productivity</b>				
CAT - General enquiries-live	85%	100.0%	0.0%	100.0%
CAT - Reports & Other-live	80%	79.3%	34.0% ↑	45.3%
Investigations - Investigations-live	80%	75.0%	1.7% ↑	73.3%
Authorisations - Applications-live	80%	37.0%	6.9% ↑	30.2%

Overall, we saw year-on-year improvements in operational performance against nearly all key performance indicators in the balanced scorecard, including in all but one of the indicators bearing on timeliness, service and productivity. We will continue to strengthen and refine our casework balanced scorecard so it remains fit for purpose and reflects the BSB's priorities as a modern, risk-based regulator: More detailed statistics about our regulatory casework is available in our Regulatory Casework Statistical Report.

## Enforcement

Our enforcement work aims to protect the public and to deter ethical or professional failures by taking prompt and effective action against barristers guilty of serious misconduct. In 2024/25 we assessed 1,883 reports (1,851 in 2023/24) and concluded 92 investigations (94 in 2023/24). We scored highly for the quality of decisions in both respects in independent quality audits.

Reports involving cases of family law continued to be the most common; 200 reports assessed in 2024/25 related to family law proceedings (compared to 152 reports in 2023/24). We also saw an increase in reports from litigants in person: 387 reports, which accounted for 20.8% of all reports (compared to 15.8% in 2023/24 - 285 reports), many of which relate to family proceedings.

Of the 92 Investigations decided, 60% were closed after investigation and 40% were referred for disciplinary action. For those closed after investigation, the outcomes were:

- Administrative sanction - 16
- Dismissed - 20
- Withdrawn - 20

Of the 53 cases closed at Disciplinary Tribunal, 29 were found proved, 6 dismissed, 17 were withdrawn<sup>1</sup> and one had another outcome.<sup>2</sup>

---

<sup>1</sup> The majority of these relate to withdrawn cases against the same barrister who was disbarred in separate proceedings. Once allowance is made for this the overall number remaining is commensurate with previous years.

<sup>2</sup> The Barrister concerned agreed permanently not to apply for a practising certificate.

---



Of particular note was the increase in the reporting of cases of bullying and harassment. We received 53 such reports in 2024/25 (compared to 29 in 2023/24) and began 12 investigations compared to 10 the previous year. Five barristers were sanctioned as a result of enforcement action in bullying and harassment cases.

We nevertheless acknowledge the criticisms made of our approach to the handling of such cases by Baroness Harman and by witnesses in a high profile case which reached the Tribunal at the end of 2024. We initiated action in 2024/25 to accelerate our conduct of such cases and better to support witnesses. Specifically:

- we have re-designed our enforcement process to accelerate cases, including those of bullying and harassment and are currently consulting on changes to our regulations to give full effect to this re-design;
- we have consulted on changes to the Disciplinary Tribunals Regulations to give the Bar Tribunals and Adjudication Service greater power to manage cases and so cut delays at the Tribunal stage. Subject to further consultation, these powers will come into full effect from January 2027;
- we are taking a range of actions better to support witnesses in cases involving bullying and harassment. These include:
  - ✓ the introduction of a victim support service which is already available;
  - ✓ the introduction later this year of training for our enforcement teams on a trauma-led approach to regulatory enforcement.
  - ✓ consultation on a change to our regulations to provide that witnesses in cases in sexual harassment cases should have an automatic presumption of anonymity.

These steps supplement the regular training already provided to our teams on handling allegations of sexual harassment and on supporting vulnerable witnesses.



## Supervision

The Supervision team supervises barristers, chambers, BSB entities and Bar training and pupillage providers. In undertaking our supervision activity, we adopt a risk-based approach and seek to foster a constructive relationship with those we regulate and other stakeholders and to achieve appropriate outcomes, resulting in less enforcement action and better protection and promotion of consumers' interests. Our Supervision Strategy and Framework<sup>3</sup> provides further detail on our approach.

In 2024/25 the Supervision Team followed up 157 reports referred to it by the Contact and Assessment Team or received directly (163 in 2023/24) and initiated 79 thematic reviews (29 in 2023/24). The higher number of thematic reviews reflected an increase in testing barristers' and entities' compliance with the Money Laundering Regulations.

Reports responded to by Supervision covered a wide range of themes with a higher number focused on the following:

- compliance with the price, service and redress transparency rules;
- standards of Bar training and compliance with the Authorisation Framework in both vocational and pupillage training;
- barrister competence;
- ineffective complaints handling;
- data security breaches and cyber security attacks;
- ensuring the orderly closure of sole practices or chambers following suspension, disbarment, death or closure for business or personal reasons.

## Authorisations

The Authorisations Team takes decisions relating to [exemptions and waivers](#) from the training requirements and authorises entities, education and training providers, individuals to conduct litigation, public access, and the authorisation of organisations and individuals to instruct barristers directly under the [Licensed Access scheme](#).

In 2024/25, the Team:

- decided 955 individual applications for authorisation in different categories.
- we authorised 18 more BSB entities than in 2023/2024 bringing the total number to 163; and
- registered 630 new pupillages and signed off 593 pupillages.

---

<sup>3</sup> Supervision Strategy and Framework can be found [here](#).

## Independent Decision-Making Body

The Independent Decision-Making Body (IDB) takes decisions on enforcement cases referred to it after investigation. It also reviews authorisation decisions and decisions by the Inns' Conduct Committee. Decisions and reviews are undertaken by five person panels with a lay majority.

Of the 68 enforcement cases heard by the IDB, 41 were referred for disciplinary action, 11 cases had administrative sanctions imposed and 8 cases saw allegations dismissed. In the previous year these figures were 52, 8 and 18 respectively.

Of the cases referred by the IDB for disciplinary action, 34 cases were sent to a 5-person Disciplinary Tribunal, 3 cases to a 3-person Disciplinary Tribunal and 3 were disposed of by the Barrister consenting to a finding of professional misconduct via the [Determination by Consent](#) (DBC) process.

The 23 reviews considered by the IDB in the period comprised of 17 executive decisions on applications and 6 Inn's Conduct Committee (ICC) decisions.

Of the 17 executive decision cases heard, the outcomes saw 6 cases with the decision affirmed (upheld), 8 cases with the decision affirmed (amended), 1 case with the IDB substituting the executive decision with another decision and 2 cases referred back for further information.

Of the 6 ICC cases heard, the outcomes saw 2 decisions affirmed and 4 decisions substituted with another decision by the IDB panel.

# Strategic Aim 2 – Standards

## Overview

We said we would:

- continue our programme to assure the required standards of professional competence at the Bar;
- develop a consolidated set of regulatory requirements for barristers in chambers;
- continue to develop and implement arrangements for the assessment of advocacy and negotiation skills during pupillage;
- develop a strategy to address the new regulatory objective of “promoting the prevention and detection of economic crime”;
- support the development of an apprenticeship route for Bar training;
- continue our evaluation of the recent reforms to Bar training.

We delivered:

- a programme of work to assure ongoing standards of competence at the Bar (see detail below);
- dedicated web pages consolidating the practice management obligations we place on barristers;
- approval for the four Inns of Court and five circuits to deliver advocacy training during pupillage;
- continuing supervision to promote compliance with anti-money laundering rules: our work is detailed in our annual report, published separately [here](#).
- the approval with the Institute for Apprenticeships and Technical Education (IfATE)<sup>4</sup> of the [barrister apprenticeship standard](#);
- continuing evaluation of the Future Bar Training reforms (which were introduced in 2019).

---

<sup>4</sup> IfATE has since been superseded by Skills England. Skills England is an executive agency sponsored by the Department for Education that works with employers to develop and approve apprenticeships.

---

## Commentary: our performance and impact



We maintain standards in the profession through various regulatory interventions including, but not limited to:

- strategic oversight of the operation and outcomes of Bar Training. This draws together the work of teams from across the organisation such as authorisation, supervision, data and insights, policy and examinations. We have published insight into this work and our impact through our [Annual Bar Training reports](#) in the past three years (covering the period September to August) and this year we are providing this insight through this BSB wide Annual report (see below).
- decisions relating to [exemptions and waivers](#) from the training requirements and authorises entities, education and training providers, individuals to conduct litigation, public access, and the authorisation of organisations and individuals to instruct barristers directly under the [Licensed Access scheme](#);
- supervision of barristers, chambers, BSB entities to ensure compliance with our Handbook rules in the public and consumer interest (see the efficiency section of this report for more information);
- designing policies to ensure ongoing competence of Barristers (see the sections below and other chapters for more detail).

## Bar Training

Our work to regulate providers of vocational training and pupillage continued throughout the year (covering the period September 2024- August 2025). This report offers insight into how standards in Bar training during both the vocational and pupillage components have continued to be set, met, and assured<sup>5</sup>. Annual Reports on Bar Training for prior years (2022, 2023, 2024) can be found [here](#).

### Pupillage training providers

We have 289 authorised pupillage training providers as of August 2025. We registered 630 new pupillages and signed off 593 pupillages.

In the year to 31 August 2025, we responded to 13 separate reports (compared to 23 in the previous year) dealing with a wide variety of matters, from pupillage terminations to the standards of pupil's training. We have seen an increase in the number of both pupillage and vocational providers recognising the risks associated with pupils and

<sup>5</sup> This is specifically in the following ways: (a) how the four key principles of Bar Training (Flexibility, Accessibility, Affordability and High Standards) continue to be sustained in the delivery of Bar Training and in our decision-making and further developments; (b) how the processes for authorising, assessing, monitoring and evaluating Bar Training are working; (c) how we have dealt with issues that have arisen during the year.



students' use of Artificial Intelligence (AI) and we are looking at how best to provide guidance for these providers in this expanding area.

### Vocational Training Providers

Since implementation of training reforms in 2019, we have authorised ten providers<sup>6</sup> across 21 locations. No new providers or new sites at existing providers have been authorised in the past year. We reached the significant milestone of re-authorising vocational training providers for another four years using our risk based and outcomes focussed approach to regulation as per our [Authorisation Framework](#). In doing so we comprehensively reworked the regulatory agreement we have with providers, clarified the service levels expected and strengthened our powers for amending and varying the agreement in future.

We continued to engage with vocational training providers through our regular monitoring activity, quarterly Bar Training Forum and provider and External Examiner workshops, providing opportunities for sharing of best practice<sup>7</sup>. This helps us ensure that there is a common understanding of our requirements and so to promote consistency of student experience.

In the year up to 31 August 2025, we received 7 reports about 5 vocational training providers, dealing with a wide variety of matters from academic misconduct and discrimination to fair recruitment and standards of vocational component delivery. These resulted in Supervision visits and appropriate actions being put in place.

### Centralised Examinations

The Bar Standards Board sets central examinations for Bar training students in criminal and civil litigation. Since their inception in 2020, the Bar Training centralised assessments have been sat 34,023 times in total (including 8,279 times in the 2024/2025 Academic year which is the period covered by this report). This includes all first sit and resit attempts by Bar Training students.

Over this year, the Bar Training passing rates have varied from 48.1% for Civil Litigation in August 2025 to 61.5% for Civil Litigation in December 2025.

---

<sup>6</sup> [List of Vocational Training Providers](#)

<sup>7</sup> In addition to the centralised assessments, students take assessments that are set and marked by the training providers (Advocacy, Professional Ethics, Opinion Writing and Legal Research, Drafting, and Conference Skills). We appoint External Examiners (EEs) to provide us with assurance on the consistency of standards of the assessments set by the training providers. They assess whether: the assessment process measures student achievement rigorously and fairly in line with our Curriculum and Assessment Strategy; and the standards and the achievements of students are consistent between training providers.

We continued to publish a [Chair's report](#) after each setting of the Litigation assessments which details the quality assurance processes undertaken, as well as how the passing standard has been set with reference to the threshold competencies the litigation exams seek to measure.

We have now had 12 sittings of the Pupillage Ethics Assessment, and, in total, we have assessed 1,477 individual pupil barristers, who have attempted the assessment a total of 1,681 times (either as a first sit or resit). In 2025, 615 candidates made 691 attempts. The passing rates were 90.1% in January, 71.3% in April<sup>8</sup> and 79.7% in July.

We continued to publish a [Chair's report](#) after each setting of the Ethics assessment which details the quality assurance processes undertaken, as well as how the passing standard has been set with reference to the threshold competencies the exam seeks to measure.

### **Bar Training Statistics Report by Course**

Each year, we publish a report on key statistics relating to vocational Bar training and progression to pupillage with the aim to provide more accessible information for prospective students that they can use to help inform them about their choice of provider and their chances of success in obtaining pupillage. There are two reports, one focussing on results by provider (which was [published](#) in July 2025), and one covering enrolment, results, and student progression across the course which is being published alongside this Annual report.

### **Advocacy and negotiation skills**

We have continued to develop and implement arrangements for the assessment of advocacy and negotiation skills during pupillage as the final part of our reforms to Bar training. All four Inns and five Circuits have been approved to provide pupillage advocacy courses and these are now being delivered.

Two providers (Inns of Court College of Advocacy (ICCA) and the Society of Mediators) will be commencing a pilot of negotiation courses towards the end of 2025 and beginning of 2026. We have been working with these providers and other stakeholders to establish the requirements for these courses, which have been published in our Curriculum and Assessment Strategy, alongside a comprehensive framework for evaluating each pilot.

---

<sup>8</sup> Operational issues led to 16 candidates being unable to start or complete the exam successfully. If excluded, the passing rate for April is 82.7%.

## Apprenticeships

In December 2024, The Institute for Apprenticeships and Technical Education (IfATE)<sup>9</sup> and the Bar Standards Board (BSB) announced the Barrister Apprenticeship Standard. This new standard sets out the skills, knowledge and behaviours needed to become a successful practising barrister in England and Wales. We are continuing to support the development of an apprenticeship route for Bar training and remain in regular contact with the Barrister Apprenticeship Trailblazer Group and work with them in developing an approved apprenticeship delivery model.

## Assuring Standards Policy Development Programme

As part of our continuing programme to assure the required standards of professional competence at the Bar we launched our Competence Monitoring Framework (CMF) as part of our [Data and Intelligence Strategy](#). Including almost 40 indicators of professional competence, these combined new and existing data sources, including consumer feedback and new questions added to the annual Authorisation to Practise process. The capability provided by the CMF will help us to ensure that our regulatory approach and interventions on competence are targeted, proportionate, evidence-based, and impactful.

This year we introduced an improved approach to Continued Professional development (CPD) spot checks and conducted the first round of spot checks in Summer 2024.

We established our first Inter-Regulator Ongoing Competence Forum in February 2025. Recognised as good practice by the LSB, this brings seven legal services regulators together to share insights and promote good practice. Another Forum will take place in late 2025.

We continued to evaluate the CPD materials we introduced in January 2024. In the Spring of 2025, we received over 1,200 responses from the Profession to an online survey. We will publish our key findings and use them to refine our approach, focus areas, and next steps into 2026.

We launched the next of our series of CPD good practice case studies in partnership with individual barristers, chambers, and employers. We continue to receive positive feedback on these insights into the profession.

We launched [updated specialist standards and resources for barristers in youth justice proceedings](#) in March 2025 to help practising barristers understand and meet the requirements and expectations of this important practice area. We will continue to raise awareness of these resources and keep them up to date.

---

<sup>9</sup> IfATE has since been superseded by Skills England. Skills England is an executive agency sponsored by the Department for Education that works with employers to develop and approve apprenticeships.

## Anti-money laundering

Whilst the Government assesses the risk of money laundering in the legal sector as high, its latest National Risk Assessment, published in July 2025, clarifies that barristers are exposed to lower risks than other legal professions. This is in accordance with our own low risk assessment for barristers and BSB entities for the following reasons:

- practising barristers do not typically engage in conveyancing and only a very small minority act as Trust and Company Service Providers (TCSPs).
- barristers and BSB entities are prevented by the rules in the BSB Handbook from holding client money or managing their clients' affairs.
- the majority of instructions are referred by solicitors and accountants, who are obliged to conduct their own Customer Due Diligence and therefore provide a first line of defence in assessing risk.

We nevertheless review relevant chambers, BSB entities and barristers to determine their individual risk profiles. This year our focus was on ensuring that barristers acting as TCSPs and conducting tax advisory work are compliant with the Money Laundering Regulations. We also conducted spot checks to ensure that barristers comply with their obligation to conduct practice risk assessments. Our full report on our activity this year is on our [website](#).



# Strategic Aim 3 – Equality

## Overview

We said we would:

- consult on recommendations to change our Equality Rules to promote equality of opportunity;
- continue the work of diversity task forces;
- analyse the experience of barristers' services of users from different minority groups;
- launch our internal anti-racist strategy and action plan.

We delivered:

- a consultation on [changes to the equality rules](#). We decided not to proceed with the proposed changes, and instead will work with the profession to seek better outcomes within our current framework;
- the continuing work of the diversity task forces. The task forces assisted us with our work on the equality rules and provided input on our work on Disability and [Technology at the Bar](#), in particular the adoption of AI;
- publication of our [anti-racist strategy](#) and year one action plan. We have since published an update and our year two action plan.

## Commentary: our performance and impact



Our consultation on the equality rules attracted a lot of attention and we had a significant response to the proposals. We also engaged extensively with barristers and other stakeholders in meetings and consultation events. Although most responses disagreed with our central proposal to amend the Core Duties, we were pleased to see the profession demonstrate its commitment to diversity and equality of opportunity. We want to build on that shared commitment, which will be particularly important as we move forward to implement the recommendations of the Harman Review.

There continue to be barriers to entry, retention and progression for those who share certain protected characteristics and those who are from certain socio-economic backgrounds. Whilst the representation of female barristers, barristers from minoritised ethnic backgrounds, and barristers with a disability has grown at the Bar, these groups

remain underrepresented at senior levels. Female barristers and barristers from minoritised backgrounds earn less on average than their White male counterparts even when allowing for specialism, seniority and geography. We remain committed to addressing these issues, in partnership with the profession.

The web pages we introduced in 2024/25 to clarify expectations of chambers summarise barristers' existing practice management obligations to promote equality of opportunity and diversity.

We are proud of the commitment our people have shown to developing and implementing our first anti-racist strategy. We have made good progress in our first year, and continue to focus on implementing the strategy. So far, we have received a bronze award from the Employers Network for Equality and Inclusion (ENEI) in recognition of our progress in equality and diversity and our [annual diversity report](#) has shown an increase of six percentage points in members of the workforce from a minoritised ethnic background. Our Board Code of Conduct and our Senior Leadership Team's objectives now include a commitment to anti-racism.

# Strategic Aim 4 – Access

## Overview

We said we would:

- promote public legal education in collaboration with our fellow regulators and work with other regulators to look at how the Legal Choices website can develop a one-stop shop for reviewing regulatory information about any regulated lawyer;
- ensure that our transparency rules are being complied with and are effective;
- take forward our examination of the role of new technology in the legal services market;
- complete our market study of online comparison or of intermediaries offering to broker access to barristers;
- look at the needs of digitally excluded consumers by taking part in research with other front-line regulators to examine the experience of consumers with limited access to, or ability to use, digital technology; and
- examine the extent to which solicitors offer their clients a choice of barrister.

We delivered:

- continuing work with our fellow regulators on [Legal Choices](#) and the Regulatory Information Service;
- monitoring compliance with our transparency rules, largely via our supervision activities. In the light of this, and further research that we have undertaken, we published updated transparency guidance and we will be considering further changes to promote transparency in the current business year;
- research into technology adoption and use at the Bar, which was published in April 2025;
- a market study of digital comparison tools and completion of our work on intermediaries. We plan to publish the findings of both projects later in the current business year;
- research into digital exclusion which we expect to publish in 2025;
- research with barristers' clients (soon to be published) has given us insights into the choices that are offered to clients by solicitors when instructing a barrister. We have also undertaken research with solicitors, although there were delays in recruiting participants. We expect to publish a report of that later in 2025-26.

## Commentary: our performance and impact



The future growth and international reputation of the Bar will depend on maintaining a competitive market for barristers' services, marked by high standards and by the safe adoption of technology to enhance efficiency and cut costs. We continue to work to improve transparency and choice in relation to barristers' services. A significant contributor to this may be the adoption of new technologies to better enable access to legal services.

We launched our research into technology adoption at the Bar at a very well-attended event, and we were delighted by the interest in the subject matter. We have since established a joint working group with the Bar Council, to share research, evidence, and other sector trends or developments about technology and innovation at the Bar, discuss high level priorities in order to avoid duplication of effort and disseminate technology competence or other resources to members of the Bar.



# Strategic Aim 5 – Independence

## Overview

We said we would:

- complete our governance reforms;
- design and launch a new organisational learning plan;
- design and implement a new performance management and development policy;
- continue to promote engagement and collaboration with consumers organisations, the profession and other regulators.

We delivered:

- the completion of our governance reforms, with a comprehensive governance manual now in place;
- the BSB's first organisational learning plan based on a comprehensive learning needs assessment which helped us to increase the knowledge and capability of our people. Data on learning needs were gathered from all levels of the organisation, learning needs were prioritised to deliver key business objectives and an annual plan delivered that included a blend of e-learning, classroom based courses and individual activity. Evaluation of learning activities was positive and has been incorporated into this year's plan;
- a new performance review system and policy covering assessment of behaviours as well as delivery of objectives; We consulted widely on a new performance review (appraisal) policy and process and made extensive improvements to ensure that the new policy would integrate with our existing culture while also supporting the organisation's drive towards high performance and continuous improvement. New performance management software was selected and procured;
- extensive consultation with consumer organisations and other stakeholders, together with supporting research, to inform development of our five year strategy.

## Commentary: our performance and impact



The Bar Standards Board aims to be a self-confident and independent regulator which reaches its own judgements about risks to the public interest at the Bar, which makes proportionate choices about the regulatory interventions to deploy to address those risks and which is able and willing to work with the profession to achieve shared objectives.

Our annual 2024 People Survey showed that we are well on the way to building this culture. Levels of engagement are high, with 80% of our people responding favourably. The BSB scored above the professional bodies and industry associations benchmark in all areas of the survey. Our work on enhancing learning and performance across the organisation is an essential part of developing our culture and ensuring that the BSB remains a great place to work where people are supported and enabled to excel in delivering our regulatory functions. Our People survey showed significant improvement in colleagues feeling recognised, thanked and praised for their work, having the right opportunities to learn new skills, and feeling supported in developing their careers.

# Our teams and their work

## Our Board

(See “Our governance” section on page 28)

## BSB Director General

**Mark Neale**

### Regulatory Operations

**Director: Saima Hirji, 36 people** | Receipt and assessment of all incoming information | Authorisations

### Standards

**Director: Rupika Madhura, 19 people** | Supervision and Qualifications, management of the centralised examinations function.

### Strategy and Policy

**Director: Ewen MacLeod, 16 people** | Policy development | Regulatory risk | Equality and access to justice | Research

### Legal and Enforcement

**Director: Sara Jagger, 23 people** | Investigations of potential breaches of the BSB Handbook/ Enforcement and disciplinary action/ legal advice and support including litigation support

### Communications and Public Engagement

**Director: Wilf White, 4 people** | External and internal communications | Public and stakeholder engagement

### People Team

**Director: Teresa Haskins, 5 people** | People strategy and support | Culture and Values | Learning and Development

Two further teams report directly to the Director General:

- **Governance and Corporate Services** led by *Rebecca Forbes with 5 people*
- **Programme Management** led by *Michael Farmer with 3 people*

We also share the following support services with the Bar Council: Facilities, Finance, Information Services, Records, the Project Management Office, and those centralised Human Resources services not provided by the dedicated BSB function.

## 2024 Reorganisation

From 2 December 2024 as part of the Reform Programme to improve efficiency and effectiveness a new structure was introduced which included changes to a number of departments, with certain directors and their departments having new functions and responsibilities.

## The new structure and what our teams do

**Ewen MacLeod, Director of Strategy, Policy and Insights, 18 people**

**Strategy, Policy and Insight:** Drawing on enhanced data, intelligence and research, the Department identifies future and current risks to the public interest, as defined by the Regulatory Objectives, and develops timely consumer-focused strategies to mitigate those risks and to seize opportunities. It owns our Handbook and Code of Conduct and leads on updating them. The Department leads on diversity at the Bar.

**Rupika Madhura, Director of Regulatory Standards, 41 people**

**Regulatory Standards:** The Department ensures that professional standards evolve to support the BSB's strategy, including to responding to changing consumer expectations and new technologies, and the standards expected by us are reflected and adhered to from qualification to retirement. The Department includes the Supervision, Examinations and Authorisation functions of the Bar Standards Board and also a policy function responsible for the framework underpinning the qualification and continuing professional development of the profession.

**Saima Hirji, Director of Regulatory Enforcement, 37 people**

**Regulatory Enforcement:** The Department will take prompt and effective action to enforce professional standards where these are breached and where enforcement is necessary for the protection of the public and/or as a deterrent to unprofessional behaviour. The Department will be accountable for the end-to-end enforcement process.

**Alex Kuczynski, Director of Legal and Information Management, 9 people**

**Legal and Information Management:** The Department owns legal risks arising from the delivery of our regulatory functions, handles litigation, provides legal advice to the organisation, develops decision-making policies and guidance and oversees and supports knowledge management systems. The Department also leads on compliance with our statutory information law responsibilities.

**Debbie Stimpson, Director of Planning, Programmes and Engagement, 11 people**

**Business Planning, Programmes and Engagement:** The Department ensures that we have the business plans and resources needed to deliver our strategy and to deliver our functions, execute major programmes of work efficiently and to time. The team also communicates effectively with our stakeholders about our plans and performance and encourages stakeholders to engage with us so that all our policy making takes full account of their views and its likely impact.

**Teresa Haskins, Director of People and Culture, 6 people**

**People and Culture:** The Department will ensure that the Bar Standards Board's people are engaged and empowered, are motivated by compelling and relevant values and work within a diverse, inclusive and proactive culture.

Rebecca Forbes is Head of Governance reporting to Mark Neale as part of the Director General's Office, which includes 4 people. The Governance Team will ensure that the BSB maintains good governance practices, policies and procedures. We ensure compliance by our staff and non-executives (including the Board) with our own Constitution and with the rules set by the Legal Services Board. We also provide support for the Chair and Director General's offices.



# Our governance

We are governed by a Board made up of a combination of lay people and barristers. It has six lay members (including the Chair) and five barrister members. During 2024-25 three members ended their terms and they were all replaced by new members. Ms Ruby Hamid, Ms Tracey Markham and Ms Ruth Pickering joined the Board and Mr Simon Lewis, Ms Allison Alden OBE and Mr Steven Haines all ended their terms.

The Board met 10 times during 2024-25: there were 6 ordinary meetings one of which was later reconvened as a second meeting, 2 special meetings and 1 Away Day. We also held 7 Board seminars which allowed members to explore aspects of the BSB's work in greater depth. Ordinary Board meetings are partly held in public and we invite members of the legal Press to attend all public sessions. Board meetings during 2024-25 continued to be held on a hybrid basis to enable members to join online if necessary.

During 2024-25 our Board members were:

**Chair:** Kathryn Stone OBE

**Vice-Chair:** Mr Andrew Mitchell KC

**Barrister members:** Mr Jeff Chapman KC  
Mr Simon Lewis (until December 2024)  
Ms Ruby Hamid (from January 2025)  
Ms Irena Sabic KC  
Professor Leslie Thomas KC

**Lay members:** Ms Gisela Abbam FRSA  
Ms Alison Alden OBE (until December 2024)  
Mr Emir Feisal JP  
Mr Steven Haines (until December 2024)  
Ms Tracey Markham (from January 2025)  
Ms Ruth Pickering (from January 2025)  
Mr Stephen Thornton CBE

## Accountability and how we manage risk

Under the Legal Services Act 2007, the Legal Services Board is responsible for overseeing the approved regulators for legal services in England and Wales. The approved regulator for barristers is the General Council of the Bar (GCB), which is also the representative body for the Bar.

The Act requires the separation of regulatory and representative activities, so the GCB has established the Bar Standards Board to exercise its regulatory functions independently. We have a protocol in place with the GCB to ensure that the exercise of the regulatory functions is not prejudiced by the Bar Council's representative functions.

Our Board manages its work with the help of four sub-committees:

- The **Governance, Risk and Audit Committee** (GRA) is responsible for ensuring that our corporate governance standards and internal controls are maintained. The Committee keeps all our risk management framework and internal audit arrangements under review and advises the Board accordingly. The corporate risk register is reviewed at least quarterly by our Senior Leadership Team and the GRA Committee. In addition, the GRA Committee conducts regular in-depth risk reviews throughout the year, and considers Internal Audit reports.
- The **Performance and Strategic Planning Committee** (PSP) leads work in relation to the development of the BSB's strategic direction and plans and the allocation of resources to deliver the strategic and business plans. It oversees performance against relevant service levels and considers whether financial and operational resources are properly and effectively allocated and efficiently managed across the organisation.
- The **Nomination Committee** advises the Board on fair, inclusive and transparent approaches to recruitment to the Board and senior executive roles and oversees, on behalf of the Board, some aspects of the recruitment process.
- The **Remuneration Committee** makes recommendations to the Board on the remuneration and terms of engagement of BSB staff, its non-executive members and advisers. It also considers appeals by the Director General and his direct reports against decisions relating to dismissal, disciplinary sanction, grievance, promotion or demotion.

# Our income and expenditure and Cost Transparency Metrics

The Bar Standards Board (BSB) is firmly committed to the principle of transparency and publishes financial and other transparency metrics as part of the Annual Report and Business Plan in accordance with the recommendations of the Legal Services Board's (LSB) Cost of Regulation Project. We combine our Cost Transparency Metrics, with the figures here in our annual report so that all our financial reporting can be found in one place.

We pay close attention to how we spend our money:

- Our budgets are set annually and our budget envelopes are informed by our business plans;
- The budget is divided up into departmental budgets which our Directors manage;
- Each month we receive detailed management accounts which enable us to keep a close eye on our business;
- Each quarter we think about what we might need to spend in the future and produce forecasts;
- We tightly monitor our largest area of spend which is our staffing costs;
- We make sure that our resources are directed at our key priorities; and
- Our financial performance is scrutinised by the Board and its Performance and Strategic Planning Committee (PSP).



## Income

### Practising Certificate Fees (PCF)

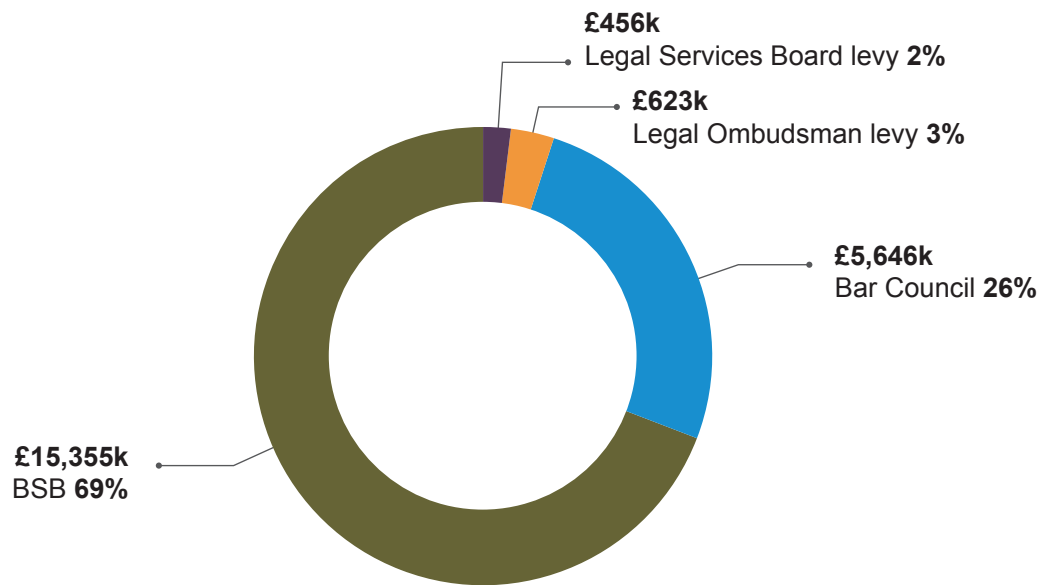
Barristers are only legally entitled to undertake reserved legal activities if they are authorised to do so by the BSB. To be authorised they must hold a current Practising Certificate renewed annually via a process known as Authorisation to Practise, which includes payment of a Practising Certificate Fee (PCF). The PCF funds the expenditure that falls within the 'permitted purposes' as defined by the Legal Services Board (LSB). The PCF is shared between the Bar Standards Board who deliver the regulatory functions, the Bar Council who deliver non-regulatory permitted activities, and levies for the Legal Services Board and the Legal Ombudsman (LeO).

Band	Thousands	Thousands
Metric	2023-24	2024-25
Total PCF Reported	£18,838	£22,080

In 2024-25 Practising Certificate Fees were set as follows:

Band	Income Band	2024-25 Fees
1	£0 - £40,000	£119
2	£40,001 - £60,000	£316
3	£60,001 - £90,000	£635
4	£90,001 - £150,000	£1,154
5	£150,001 - £240,000	£1,753
6	£240,001 - £350,000	£2,377
7	£350,001 - £500,000	£2,540
8	£500,001 - £750,000	£3,213
9	£750,001 - £1,000,000	£3,399
10	£1,000,001 - £1,500,000	£3,855
11	£1,500,001 and above	£4,080

## Allocation of PCF between Bar Council, the BSB, LSB and LeO



	2023-24	2024-25
Portion of PCF funding 'non- regulatory permitted purposes'	32%	31%
Total Permitted Purposes reserves	£5,347k	£5,883k

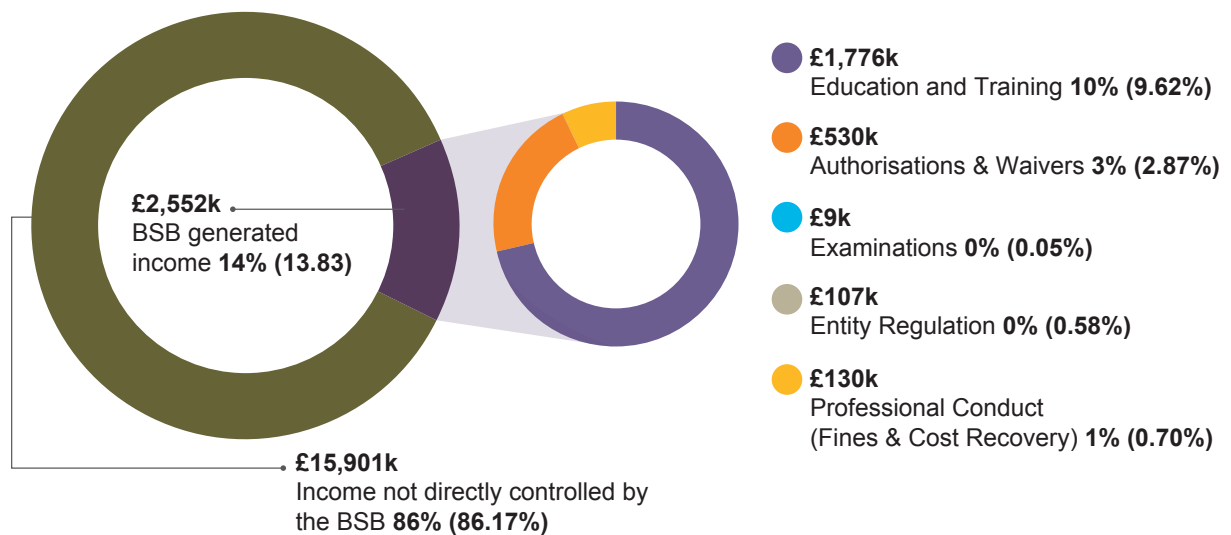
Apart from the PCF, some of our income comes from charges we make for specific services we provide to individuals and organisations. These income streams include the fees from Bar training providers, and the Bar Transfer Test.

Income Area	£ thousands 2023-24	£ thousands 2024-25
Education and Training	£1,703	£1,776
Authorisations and Waivers	£351	£530
Examinations	£33	£9
Entity Regulation	£89	£107
Professional Conduct (Fines & Cost Recovery)	£80	£130
<b>Total BSB Generated Income</b>	<b>£2,256</b>	<b>£2,552</b>

As with previous years, income from fees for Bar training remained the most significant proportion of the BSB controlled income during 2024-25. Overall, the BSB exceeded its (non-PCF) income target by £298k (13%).

Total Income for the BSB	£ thousands 2023-24	£ thousands 2024-25
PCF Contributions	£12,860	£15,355
Income from GCB Resources Group	£446	£546
Planned Contributions from Reserves	0	0
<b>Total income not directly controlled by the BSB</b>	<b>£13,306</b>	<b>£15,901</b>
<b>Total BSB Generated Income</b>	<b>£2,256</b>	<b>£2,552</b>
<b>Total regulatory income</b>	<b>£15,562</b>	<b>£18,453</b>

### BSB Income



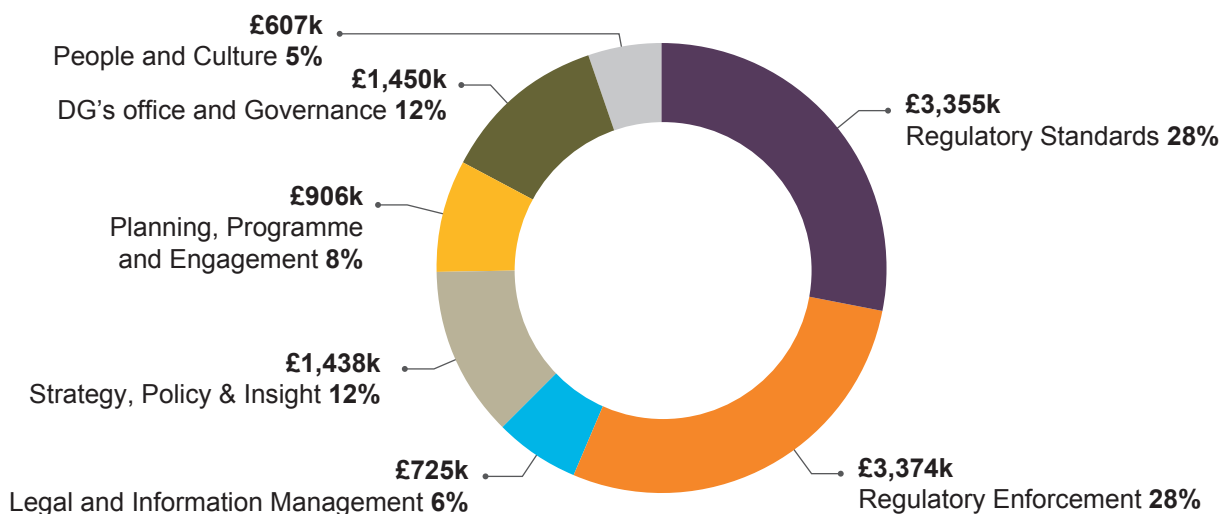
## Expenditure

BSB directly controlled expenditure was £11,855k against a budget of £11,889k, a £34k underspend (0.3%).

The full cost of regulation includes an allocation of shared costs (IT, Finance, HR and Premises costs) from the Bar Council Resources Group. The Resources Group expenditure budget is managed separately, outside the direct control of the BSB, and is apportioned to the organisation.

Department	£ thousands 2023-24	£ thousands 2024-25
Regulatory Standards	£2,608	£3,355
Regulatory Enforcement	£2,782	£3,374
Legal and Information Management	£678	£725
Strategy, Policy & Insight	£1,371	£1,438
Planning, Programme and Engagement	£725	£906
DG's office and Governance	£1,188	£1,450
People and Culture	£517	£607
<b>Total Direct BSB Expenditure</b>	<b>£9,869</b>	<b>£11,855</b>
Resources Group allocation & adjustments	£5,656	£6,338
<b>Total cost of regulation</b>	<b>£15,525</b>	<b>£18,193</b>
<b>Average cost of regulator for each authorised individual</b>	<b>£726</b>	<b>£835</b>

### Direct BSB Expenditure in 2024-25



The average cost of the regulator for each authorised individual is calculated by dividing total BSB PCF income (£15,355k in 2024-25) by the number of practising barristers at 31 March 2025 (18,392).

## Staff resources

	2023-24	2024-25
Headcount	114 (110.2 FTE)	126 (121.8 FTE)

## Remuneration of the Board and Executive

Chair of Board total remuneration	£116,616	£120,332
Vice Chair total remuneration	£38,796	£41,515
Director General total remuneration	£169,957	£181,105

The median staff salary at the BSB in 2024-25 was £46,108, the ratio between this and the Director General (salary: £181k) was 1: 4.01. As well as the Director General, the Bar Standards Board has seven Senior Managers paid in a salary band which in 2024-25 was between £90k and £125k.

Staff costs	£6,594,308	£7,951,513
Board costs	£269,528	£260,597

Overall staff related costs were £7,312k (3% overspent). We ended the year with staff turnover of 14%. Any salary savings achieved from vacancies were offset by recruitment related expenses and temporary cover for business critical roles.



## Board Remuneration and Expenses in 2024-25

Name	Salary / Fees	Pension	Allowance	Total	Expenses incurred in relation to BSB business
Kathryn Stone OBE	£120,332	£0	£0	£120,332	£13,728
Mr Andrew Mitchell KC	£41,515	£0	£0	£41,515	£0
Ms Gisela Abbam	£10,000	£0	£0	£10,000	£0
Ms Alison Alden OBE	£7,500	£0	£0	£7,500	£330
Mr Jeff Chapman KC	£10,000	£0	£0	£10,000	£0
Mr Emir Feisal JP	£10,000	£0	£0	£10,000	£233
Mr Steven Haines	£11,250	£0	£0	£11,250	£0
Mr Simon Lewis	£7,500	£0	£0	£7,500	£2,065
Ms Irena Sabic KC	£10,000	£0	£0	£10,000	£0
Professor Leslie Thomas KC	£10,000	£0	£0	£10,000	£0
Mr Stephen Thornton CBE	£15,000	£0	£0	£15,000	£1,057

During 2024-25 three members ended their terms and they were all replaced by new members. Ms Ruby Hamid, Ms Tracey, Markham and Ms Ruth Pickering joined the Board and Mr Simon Lewis, Ms Allison Alden OBE and Mr Steven Haines all ended their terms.

Ms Ruby Hamid	£2,500	£0	£0	£2,500	£0
Ms Tracey Markham	£2,500	£0	£0	£2,500	£0
Ms Ruth Pickering	£2,500	£0	£0	£2,500	£0

## Non-staff costs

Total non-staff expenditure was £3,143k (8% underspend).

# Further reading

To obtain a fuller picture of who we are, what we do, and the context in which this Annual Report was produced, please visit the following pages on our website:

- This Annual Report is designed to be read in conjunction with our [Business Plan for 2024-25](#) and our [2022-25 Strategic Plan](#).
- More detailed statistics about our regulatory casework are available in our [Regulatory Casework Statistical Report](#).
- More information about our work around [equality and diversity](#) can be found there.
- Our [organisational values](#) describe the way in which we conduct all our work including the activities described in this Plan.

BAR  
STANDARDS  
BOARD

REGULATING BARRISTERS

## Contacting us

We are committed to providing a high standard of service and dealing with everyone in a way that is fair, transparent, and proportionate. We welcome your feedback on our services, particularly where the level of service has exceeded or fallen below your expectations.

Your comments and suggestions are important to us as they will help us to meet our obligations to you and to improve our performance.

Bar Standards Board  
289-293 High Holborn  
London  
WC1V 7HZ

Tel: 020 7611 1444

Email: [ContactUs@BarStandardsBoard.org.uk](mailto:ContactUs@BarStandardsBoard.org.uk)

X: [@BarStandards](https://twitter.com/BarStandards)

Youtube: [/barstandardsboard](https://www.youtube.com/barstandardsboard)

LinkedIn: [/thebarstandardsboard](https://www.linkedin.com/company/thebarstandardsboard)



## Governance, Risk and Audit Committee (GRA) Committee - Annual Report 2025

### Introduction

1. The Governance, Risk and Audit Committee (GRA) is a standing committee of the Board with oversight of governance; risk management; risk strategies; key organisational controls; internal business processes; the Assurance Framework; and the work of the Internal Auditors.
2. The Committee meets regularly throughout the year and has convened six times (to November 2025) since the last report in November 2024. It has also met once with the Internal Auditors without the executive in attendance.
3. The Committee currently has a membership of six, comprising four Board members: Stephen Thornton CBE (Chair) who will stand down in November, Andrew Mitchell KC, Jeff Chapman KC, and Ruth Pickering; and two independent (non-Board) members Akhter Mateen and Kathryn Kerle.
4. The attendance of Committee members during the period under review was:
  - (a) Stephen Thornton CBE – five (of six meetings);
  - (b) Jeff Chapman KC – four (of six meetings);
  - (c) Andrew Mitchell KC – four (of six meetings);
  - (d) Akhter Mateen – six (of six meetings)
  - (e) Kathryn Kerle – six (of six meetings).
  - (f) Ruth Pickering – four (of four meetings since appointment to the Committee).

### Executive Summary

5. The Committee is required to present the Board with an annual report on its activities and summarising the key aspects of the Committee's work during the preceding year. Since its last report the Committee has continued to focus on processes to identify, evaluate, and mitigate corporate risks. The Committee has challenged the executive (Senior Leadership Team) on its evaluation of those risks which can impact the BSB's ability to achieve its objectives. This report is intended to provide the Board and public with assurance that the risk, governance, audit, and control processes within the organisation remain robust and appropriate.
6. The GRA Committee oversees the internal audit function, appoints the Board's Internal Auditors and agrees the annual audit plan (including any audit reviews that the Board wishes conducted and any audit reviews of shared services jointly commissioned with the General Council of the Bar (GCB). RSM UK (RSM) continues to provide internal audit services to us, since being appointed in April 2023. At the September 2025 GRA meeting, it was confirmed that RSM would be offered a further two years extension of contract (from 1 April 2026 to 31 March 2028), on the basis that we will run an open tender before the end of that extension.

7. During the last 12 months RSM has completed organisation-wide fraud risk assessments, three audits and there are another two audits in progress (outlined in the paper) in progress. There are also two audits on GDPR and Payroll scheduled for the fourth quarter of the 2025/26 Internal Audit Plan and both these audits are jointly commissioned with the Bar Council.
8. In January 2025, the Committee completed its annual review of its Terms of Reference and recommended amendments to the Board. The key change was to clarify responsibilities relating to corporate and regulatory risks:
  - a) Corporate risk oversight will remain with the GRA Committee with support from the Governance Team in the Team's capacity as the *Second Line of Defence*. Corporate risks relate to threats to the BSB's own ability to deliver its strategy and objectives.
  - b) Regulatory risk oversight will now be undertaken by the Performance and Strategic Planning Committee (PSP). In the BSB's context, regulatory risk refers to risks that could impact the public interest. The processes for identifying, assessing, and reporting the BSB's actions to manage risks to these objectives are collectively known as the Regulatory Risk Framework.

## Risk Management

9. A core function of GRA is to provide the Board with assurance on the oversight of our corporate risks. This includes the identification, management, and control of the BSB's corporate risks. It does this through holding the executive to account for its risk management strategies and controls and in challenging the evidence and rationale for corporate risks that are identified.
10. In this year, the Committee had asked the executive to undertake a comprehensive review of the corporate risk register as it considered the previous risk register contained too many entries, some of which were not strategic risks of such significance to warrant Committee and Board oversight. Following review, the number of risk entries were reduced to *eight* strategic (corporate) in the revised corporate risk register. This revised approach will allow better strategic focus on high-priority risks for the executive, GRA and Board.
11. During this period, the GRA also approved the template for future corporate risk deep dives. From January 2026, a cycle of corporate risk deep dives will commence with support from an internal executive (first line) risk reporting group and the Senior Leadership Team.

## Assurance and Internal Audit

12. Following discussions on the *Lines of Defence Model* of assurance, the Committee confirmed the *Three Lines of Defence Framework*, which ensures a holistic approach to risk management with controls at various levels of a process. We consider that the clarity of accountability provided by the agreed framework is the key to the independent operation of the second line teams. Consistent with these accountabilities, the second line teams will monitor and challenge the first line on controls and actions. The teams on the second line are separate from the teams which perform regulatory operations and are empowered to provide robust challenge which will be reflected in the papers provided to the Committee. The second line teams have direct access to Committee chairs.
13. The GRA Committee agreed the Internal Audit Plan for 2025/26 in advance of the start of the business year. RSM completed the following audits since the last Committee annual report to the Board:
  - (a) Business Continuity / Disaster Recovery (Final report June 2025) – taking account of the issues identified, the Board can take *partial assurance* that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective;
  - (b) Reform Programme (Final report August 2025) - taking account of the issues identified, the Board can take *reasonable assurance* that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective;
  - (c) Data Intelligence (Final report October 2025) - taking account of the issues identified, the Board can take *reasonable assurance* that the controls upon which the organisation relies to manage this risk are suitably designed, consistently applied or effective;
  - (d) Performance Management (Currently in progress); and
  - (e) Authorisations – Transfer of Lawyers (Currently in progress)
14. During the year, the BSB requested an additional audit in the agreed audit plan (for 2025/26). The stated objective of this review is to identify and assess the BSB's fraud risk profile and susceptibility to fraud threats in operational areas using RSM's fraud risk assessment methodology. In October, RSM conducted fraud risk assessments with colleagues from a range of areas in the BSB, including Authorisations, Regulatory Enforcement, Cyber & Data Security, Finance, Governance and People. These assessments are now complete.
15. The Committee monitors the progress and impact of agreed management actions (low, medium and high priority actions) arising from audits at every meeting. In addition, there is an agreed schedule of independent reviews by RSM to ensure that management actions have been completed to an acceptable standard and have achieved the intent of the original recommendation.

## Business Continuity and Disaster Recovery Plan

16. The Committee has continued to monitor progress on the development of the Business Continuity Plan and implementation of the Disaster Recovery Plan, seeking assurance from the executive on the effectiveness of mitigation and actions taken to safeguard the organisation and respond effectively in the event of an emergency. Following RSM's audit earlier in the year, the BCP is undergoing further refinement and is expected to be signed off before the end of this year.
17. Following the review of the corporate risk register, one of the *eight* identified strategic risks for the BSB is *Business Continuity, Disruption and Cyber Security*. The Committee's continued oversight will seek to ensure that this risk has the sufficient controls and mitigations in place.

## GDPR

18. The Committee receives periodic reports on data breaches and other compliance issues from our Data Protection Officer. The last report was in July 2025 indicating that there have been *no* reportable issues in the last 12 months. The Committee understands that the risk of data breach will always exist due to human error but seeks assurance that the executive has sufficiently mitigated by employing the systems and procedures currently in place. To this end, the Committee has monitored closely the delivery of a project to ensure compliance with data retention policies.

## Independent Reviewers

19. The role of the Independent Reviewers (IR) is to assist the BSB in ensuring that our regulatory decisions remain of a high quality, that we are effective and fair, and that all the correct processes and procedures have been followed properly. During the past 12 months, the GRA received two reports from the Independent Reviewers and were assured that cases continue to be assessed and investigated in line with relevant regulations and policies.
20. The Committee were satisfied that the Independent Reviewers continue to provide a valuable quality assurance role and recommended that good practice points are relayed to operational teams providing a 360 approach to feedback. The GRA were assured that the quality of decision-making remained high, with decisions determined in accordance with the organisation's processes and procedures and communicated in a conscientious and sensitive manner.
21. The Committee noted that the six-monthly IR reports are particularly valuable for assurance purposes and future reports might include a brief section on any learning that has taken place on the part of the organisation as a result of the IR reviews. The next report will be provided to the Committee in January 2026.

## Whistleblowing

22. The annual report on whistleblowing to the Committee indicated that there have been zero reports made under the Whistleblowing Policy in the last year. The Committee is confident that any such reports will be reported, including the numbers received, the outcomes and actions taken in response, and any learning or remedial actions.

## Service Complaints

23. The Committee reviewed the annual BSB Service Complaints report (1 April 2024 to 31 March 2025) and was assured that the executive had identified trends and reasons for those trends and was implementing actions to address those. During that year, most service complaints related to delays within the Authorisations Team, which continues to have a backlog of work, and these complaints were generally upheld either fully or partially. Following GRA's request, a comprehensive trend analysis is now included in the Annual Service Complaints Report. The executive considers formal reports on service complaints on a six-monthly basis to have a more frequent opportunity to identify emerging areas of concern. The next report will be taken to SLT at the end of November.

## GRA Committee Effectiveness

24. At the last meeting of the reporting year, the Committee received the report on the Annual Committee Effectiveness Survey which focussed on membership (independence, objectivity and understanding), skills of the membership, the role, scope and effectiveness of the GRA, communication and reporting and leadership.
25. The Committee confirmed that it is generally performing effectively and fulfilling its functions, with clarity on its role and expectations. In discussion of areas for improvement, the Committee agreed it will continue work in the coming year to refine and embed the revised approach to corporate risk (currently in progress), and to work cohesively in support of the incoming Committee Chair. The outgoing Chair welcomed the Committee effectiveness findings report and proposed that the Committee consider the issues raised on a theme-by-theme basis to agree actions to enhance effectiveness.

## Other Business

26. The Committee oversees the BSB's compliance with its obligations under the Anti-Money Laundering Regulations. It reviewed the annual report which provided the Committee with the required assurance that measures were in place to reduce the risk of money laundering and terrorist funding occurring at the Bar.
27. The Committee received six-monthly updates on litigation against the BSB and statutory appeals to the High Court, to enable it to consider whether such challenges, particularly successful challenge, highlight risks arising from inadequate capacity or poor policy or process.
28. The Committee received regular updates and assurance from the Director General on operational matters and stakeholder engagement.
29. At the November meeting, the Committee also received the seventh annual (2025) report on statutory compliance (the last report being November 2024). This report covers GDPR, Health & Safety, Equality & Diversity, Human Resources, Anti-Money Laundering, Regulatory Independence and Finance. The Committee were assured that the BSB are compliant with the minimum statutory requirements. The next such report is due in November 2026.

**Forward View**

30. As well as the routine business defined by its terms of reference, over the coming year the Committee will continue work refining processes for its oversight of corporate risk and assurance activities. Having initiated a complete revision of the corporate risk register in this reporting year, the Committee will oversee work to embed this changed approach (and to ensure the processes for escalation of risks are robust and effective) in the coming year. A cycle of risk deep dives is planned, enabling the GRA to fulfil its function in our Assurance Framework, and to give assurance to the Board.
31. The draft GCB Fraud policy was approved in principle at GRA and will be taken to the Joint Audit (Bar Council and BSB) Committee in November 2025 for approval. Following approval, reports on incidents of fraud will be provided to GRA annually.
32. The Committee extends its thanks and best wishes to Stephen Thornton CBE, who stood down as the Chair of the GRA Committee at the November 2025 GRA meeting. The Board will appoint the next Chair of the Committee at its November 2025 meeting. The incoming Chair has highlighted the importance of activities to enhance the Committee's cohesiveness which will be planned early in the New Year.
33. The next GRA Annual Report will be presented to the Board in November 2026.

**Lead responsibility:** Rebecca Forbes, Head of Governance

**Report author:** Naznin Chowdhury, Governance & Risk Manager

## Performance and Strategic Planning Committee (PSP) Mid-Year Report 01 May 2025 to 31 October 2025

### Recommendation to the Board

1. The Board is invited to **note** the Mid-Year Report of the Performance and Strategic Planning Committee (PSP). The Committee's Terms of Reference require that it must report to the Board at least bi-annually. The last report received by the Board in May 2025 was the end of year report for business year 2024/2025.

### Introduction

2. The PSP is a standing committee of the Board to which it reports on matters related to organisational performance, resources and strategic planning. The PSP supports the Board and the executive in delivering high performance and in formulating the overall strategy for the Bar Standards Board (BSB) and, to these ends, it scrutinises the BSB's multi-year Strategic Plan and annual Business Plans before the Board's approval is sought. It oversees performance against relevant service levels and considers whether financial and operational resources are properly and effectively allocated and efficiently managed across the organisation. It also provides assurance to the Board on the delivery of organisational reform programmes.
3. The Committee currently has a membership of five (in accordance with the Committee's terms of reference) – all of whom are members of the Board, with a majority of lay members. The members are Tracey Markham (appointed Chair in May 2025), Gisela Abbam FRSA, Emir Feisal JP (lay members); Ruby Hamid, and Irena Sabic KC (barrister members). Kathryn Stone resigned as Chair of the Board and a Board member in May 2025, and Ruth Pickering was also then appointed to the Governance, Risk and Audit Committee and her previous appointment to this Committee was rescinded.
4. The Committee meets regularly throughout the year and has met three times since the last report. The attendance of Committee members during the period under review was:
  - a. Tracey Markham (Chair) – three (of three)
  - b. Emir Feisal JP - three (of three)
  - c. Gisela Abbam FRSA – one (of three)
  - d. Irena Sabic KC – three (of three)
  - e. Ruby Hamid – two (of three)

### Executive Summary

5. This report summarises the key aspects of the Committee's work over the past six months. The report also provides the Board and public with assurance that the scrutiny of business and strategic plans (when applicable) prepared by the BSB is robust, appropriate, and financially sound and that organisational performance is scrutinised by a committee of the Board (but without dilution of the Board's primary responsibility for oversight and monitoring of performance).



**Strategic Plan (2025-2030), Business Plan (2025-26) and Budget for 2026-27**

6. The Committee noted that 2025/26 has been agreed by the Board to be a “transitional” year that then takes the BSB to the next five-year strategy. It confirmed that the 2025/26 Business Plan will focus on maintaining improvements to operational performance to hit the targets in the balanced scorecard; completion of projects in the current strategic plan; implementation of the Reform Programme<sup>1</sup>; and preparatory work for the new strategy.
7. During the last six months the Committee has undertaken horizon scanning exercises to identify risks to the regulatory objectives and continued to receive updates on progress of planned activities within the published Business Plan for the current year (2025-26). The Committee is assured that the new strategic plan will reflect the direction of travel of the Reform Programme with a strong focus on efficiency.
8. The Committee scrutinised the budget for 2026-2027 to satisfy itself that the provisional budget was fair and reasonable in the context of the strategic and business plan and considering the cost to implement the Reform Programme, before recommending it to the Board in September.

**Oversight of performance, finance and budget**

9. The role of the PSP is to undertake closer scrutiny and analysis of performance trends and any systemic causes for those, and to make recommendations to the Board. During the last six months the Committee has reviewed performance throughout Q4 2024-25 and Q1 2025-26 against Key Performance Indicators (KPIs) and had oversight of progress towards the activities set out in the published Business Plans. Moreover, since September 2024, the Committee has received the new *balanced scorecard*<sup>2</sup> to inform its consideration of performance issues. This has proved to be a very useful analytical tool that has improved the Committee’s insight and understanding of performance issues.
10. The Committee scrutinised quarterly financial accounts and reforecasts. This included oversight of the cash and reserves to ensure that the BSB had sufficient liquidity to meet its obligations. The Committee scrutinised the year-end position at the end of the last financial year (prior to audit of the accounts) and noted that the BSB had concluded the year with a small deficit (less than the budgeted deficit).

**Regulatory risk**

11. In a regulatory risk framework, Board committees play a key role in operation of that framework by receiving regular reports on risk levels, emerging issues and how risks are being treated. Committees undertake deep dives into specific risk areas, challenge assumptions and help ensure a regulator is performing correctly in how it is handling risks to the public interest.

<sup>1</sup> The Reform Programme aims to build on our existing strengths as a regulator, complete improvements that are already underway and act on outcomes of important reviews including the Fieldfisher review, the first stage of the authorisations review, our work on risk, data and intelligence and the need to develop consumer focus in our strategy and delivery. Including the integration of Programme Management, Business Planning and Stakeholder Engagement.

<sup>2</sup> A balanced scorecard is a strategy performance management tool – a well-structured report used to keep track of the execution of activities by staff and to monitor the consequences arising from these actions.

12. In February 2025, the Board had agreed that the BSB regulatory risk framework would now report to the PSP (rather than to the Governance, Risk and Audit Committee). This was to allow the BSB to better align its strategic and performance oversight with regulatory risk management, which is the core purpose of the BSB, and the reason why the BSB carries out all its regulatory functions.
13. The PSP's oversight of regulatory risk framework will centre on an annual piece of analysis on our understanding of risks, and two or three deep dives a year into regulatory risk which will be reviewed by BSB staff and the executive prior.
14. In the last six months, the first regulatory risk deep dive was presented on *Competitive and Effective Markets*. The Committee confirmed that it was content with the format and content of this inaugural deep dive and fulfilled its role in providing an independent view on the action taken by the executive in identifying and mitigating regulatory risks in this area.

### **Reform Programme**

15. During the last six months, the Committee has received regular updates on the progress of the Reform Programme which is a long-term programme aimed at enhancing the BSB's capacity to use intelligence, at modernising the delivery of our operational services and at instilling a high performance culture delivering operational efficiencies.
16. The Reform Programme is proceeding as planned with support from the Resource Group's Project Management Office (a shared service between the Bar Council and the BSB). Delivery of the Reform Programme relies upon changes to the organisation's IT systems for enforcement processes which remains a key priority for the BSB.
17. In June 2025, an update on progress of the Reform Programme was presented to the LSB and received positively. In response to the LSB's request, the BSB agreed to provide voluntary undertakings regarding future BSB performance. The Committee continues to challenge the executive to ensure that updates provided give sufficient detail and context for assurance purposes (including information on summaries of progress and the outcomes / benefits of the Reform Programme as well tracking progress against the BSB's voluntary undertakings).

### **Other Business**

18. The Committee has continued to hold meetings remotely (using Microsoft Teams). It is intended that the Committee will continue holding meetings remotely as routine but may meet in person depending on the business on the agenda.

### **Forward View (1 November 2025 to 30 April 2026)**

19. As well as the routine business defined by its terms of reference, the Committee will continue supporting the executive with oversight of delivery of the Business Plan for 2025/2026, as well as work on the development and implementation of the BSB's new five-year Strategic Plan (2026-2030).

20. The Committee will continue to receive the regular six-monthly Human Resources report.
21. The role of the PSP Committee is to provide an independent view on the action taken by the executive in identifying and mitigating regulatory risks, and, if necessary, challenging those assertions. The regulatory risk framework identifies seven regulatory risks, and the Committee will periodically receive a report on each of those throughout the year.
22. As we continue to implement the Reform Programme, the PSP will receive a progress report at every meeting so that it can provide assurance to the Board. These updates will include deep dives into specific areas of reform as required.
23. The next PSP bi-annual report will be the end of year report which will be presented to the Board in May 2026.

**Lead responsibility**

Rebecca Forbes, Head of Governance

## Part 1 – Public

<b>Meeting:</b>	Bar Standards Board	<b>Date:</b>	27 November 2025
<b>Title:</b>	Governance documents		
<b>Author:</b>	Rebecca Forbes		
<b>Post:</b>	Head of Governance		

<b>Paper for:</b>	<b>Decision:</b> <input checked="" type="checkbox"/>	<b>Discussion:</b> <input type="checkbox"/>	<b>Noting:</b> <input type="checkbox"/>	<b>Other:</b> <input type="checkbox"/> (enter text)
-------------------	--	---	---	---

**Paper relates to the Regulatory Objective (s) highlighted in bold below**

- (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
- (f) encouraging an independent, strong, diverse and effective legal profession
- (g) increasing public understanding of citizens' legal rights and duties
- (h) promoting and maintaining adherence to the professional principles
- (i) promoting the prevention and detection of economic crime.

☐ Paper does not principally relate to Regulatory Objectives

☐ Paper also refers to the promotion of economic growth and innovation

**Purpose of Report**

1. This paper is to ask the Board to agree to an amended definition of “lay person” within its governance documents, so that no unregistered barrister might be deemed eligible to apply for posts for lay members on our governance bodies (including the Board itself).

**Recommendations**

- a. The Board is invited to **approve** the revised definition of “lay person” in the Constitution and Governance Manual; and to **note** the updates to the Seven Principles of Public Life (Appendix One to the Board’s Governance Manual).

**Background**

2. The definition of lay person and lay Board member currently stated in the BSB’s Constitution and Governance Manual are:

*“lay person” is defined in Schedule 1, paragraph 2(4) of the Legal Services Act 2007;*

*“lay Board Member” means a person who is both a lay person and a Board Member;*

3. Our governance documents are structured so that this definition of lay person cascades – every subsequent reference to a lay person (for example, lay members of the BSB’s Independent Decision-making Body (IDB)) means a person who meets the criteria as set out in the definition.

4. We have always interpreted the Act as meaning that any person who has ever been called to the Bar is not a lay person. In doing that, we have had regard to section 207 of the Legal Services Act 2007:

**207 Interpretation**

*(1) In this Act, except where the context otherwise requires —  
“barrister” means an individual who —*

- (a) has been called to the Bar by an Inn of Court, and*
- (b) is not disbarred by order of an Inn of Court;*

5. In the recent recruitment for a lay Board member, a potential candidate disputed our interpretation and countered that even though they had been called to the Bar, they were eligible to apply for this vacancy for a lay Board member. It also became apparent that another of the legal services regulators was applying a different interpretation than us (as this potential candidate had approached us both). Following discussion within the BSB, we determined that the meaning of “lay person” as set out in the Legal Services Act – and therefore which we should be applying in accordance with the current definition of “lay person” in our governance documents – is as set out at paragraph 7 below. The other regulator has now also adopted the same interpretation as us. We are awaiting advice from the Legal Services Board on its interpretation of the Act (though do not expect to have received that prior to the Board meeting).
6. For completeness, paragraphs 2(4) – 2(6) of Schedule 1 to the Act are set out below (with my bolding). Section 13 of the Act came into force on 1 January 2010.

*(4) In this Schedule a reference to a “lay person” is a reference to a person who has never been—*

*(a) an authorised person in relation to an activity which is a reserved legal activity;*

*(b) a person authorised, by a person designated under section 5(1) of the Compensation Act 2006, to provide services which are regulated claims management services (within the meaning of that Act);*

*(ba) an authorised person (within the meaning given in section 31 of the Financial Services and Markets Act 2000 (authorised persons)) in relation to regulated claims management activity (within the meaning given by section 417(1) of that Act (definitions));]*

*(c) an advocate in Scotland;*

*(d) a solicitor in Scotland;*

*(e) a member of the Bar of Northern Ireland;*

*(f) a solicitor of the Court of Judicature of Northern Ireland.*

*(5) For the purposes of sub-paragraph (4), a person is deemed to have been an authorised person in relation to an activity which is a reserved legal activity if that person has before the appointed day been —*

*(a) a barrister;*

*(b) a solicitor;*

*(c) a public notary;*

*(d) a licensed conveyancer;*

*(e) granted a certificate issued by the Institute of Legal Executives authorising the person to practise as a legal executive;*

## Part 1 – Public

*(f) a registered patent attorney, within the meaning given by section 275(1) of the Copyright, Designs and Patents Act 1988 (c. 48);*

*(g) a registered trade mark attorney, within the meaning of the Trade Marks Act 1994 (c. 26); or*

*(h) granted a right of audience or a right to conduct litigation in relation to any proceedings by virtue of section 27(2)(a) or section 28(2)(a) of the Courts and Legal Services Act 1990 (c. 41) (rights of audience and rights to conduct litigation).*

*(6) For the purpose of sub-paragraph (5)—*

***“appointed day” means the day appointed for the coming into force of section 13;***

7. The interpretation of the meaning of “lay” under the Act which we have arrived at following internal discussions is as follows:

Insofar as relates to any potential capacity as a barrister, in order to qualify as “lay”, a person must have neither (a) been called to the Bar prior to 1 January 2010, nor (b) ever have held a practising certificate as a barrister.

Someone called to the Bar since 1 January 2010 who has never held a practising certificate may be eligible to become a lay Board member, provided that they also:

- (1) Have never previously been authorised to provide reserved legal activities by another Approved Regulator (e.g. the SRA);*
- (2) Have never been any of the following:*
  - a person authorised, by a person designated under section 5(1) of the Compensation Act 2006, to provide services which are regulated claims management services (within the meaning of that Act);*
  - an authorised person (within the meaning given in section 31 of the Financial Services and Markets Act 2000 (authorised persons)) in relation to regulated claims management activity (within the meaning given by section 417(1) of that Act (definitions));*
  - an advocate in Scotland;*
  - a solicitor in Scotland;*
  - a member of the Bar of Northern Ireland;*
  - a solicitor of the Court of Judicature of Northern Ireland.*

*and*

- (3) Were not any of the following at any point prior to 1 January 2010:*
  - a solicitor;*
  - a public notary;*
  - a licensed conveyancer;*
  - granted a certificate issued by the Institute of Legal Executives authorising the person to practise as a legal executive;*
  - a registered patent attorney, within the meaning given by section 275(1) of the Copyright, Designs and Patents Act 1988 (c. 48);*
  - a registered trade mark attorney, within the meaning of the Trade Marks Act 1994 (c. 26); or*



- *granted a right of audience or a right to conduct litigation in relation to any proceedings by virtue of section 27(2)(a) or section 28(2)(a) of the Courts and Legal Services Act 1990 (c. 41) (rights of audience and rights to conduct litigation)."*

### Points for discussion

8. It is our understanding that the Board's intent has been - and remains - that unregistered barristers should not be eligible for any of the positions which we have deemed to be "lay" (on the Board, its committees or other decision-making bodies including the selection panels convened for recruitment of Board members). There has always been a third cohort ineligible for some of our roles (on the Board and IDB particularly) because they are neither practising barristers nor meet the definition of lay person and we had previously advised all unregistered barristers that they fall within that third cohort. That third cohort includes solicitors (practising or retired), Scottish Advocates, members of the Northern Ireland Bar, and so on – and this will be common across the legal services regulators who also adopt the definition of lay person from the Legal Services Act.
9. Our proposed amendment to the definition of lay person within our governance documents is as follows:  
  
"lay person" is as defined in Schedule 1, paragraph 2(4) of the Legal Services Act 2007 **except that any person who has ever been called to the Bar shall be deemed not to be a "lay person"**
10. The BSB's Constitution provides the following:  
  
*43. This Constitution may be amended or revoked by resolution of the Board only after consulting the Bar Council.*
11. We therefore consulted the Bar Council on this proposed change to the definition of "lay person". The Bar Council is content with this proposed change.

### Amendments to other governance documents

12. We have also updated Appendix One to the Board's Governance Manual, to reflect the most current version agreed by the Committee on Standards in Public Life. The amendments are made clear in red font on the text below.
13. The *Final report of the Standards Matter 2 review* in November 2021 stated: *This review examined whether the current articulation of the Seven Principles lays out the right ethical expectations for all those in public life. Contributors voiced strong support for Lord Nolan's original seven, citing their longevity, timelessness and widespread integration into British public life. Following the #MeToo movement and the uncovering of unacceptable levels of bullying and harassment in Parliament, the Committee has decided it will amend the descriptor for leadership to have a greater emphasis on treating others with respect.*

Leadership (new descriptor): Holders of public office should exhibit these principles in their own behaviour **and treat others with respect**. They should actively promote and robustly support the principles and ~~be willing to~~ challenge poor behaviour wherever it occurs.

### **Resource implications / Impacts on other teams / departments or projects**

14. There are no financial consequences or other resource implications arising from this proposal (except that this greater clarity might hopefully reduce queries to us on eligibility for lay posts and/or enable us to utilise a simpler template response).

### **Equality and Diversity**

15. The current definition of “lay person” in our governance documents (i.e. that which is set out in the Legal Services Act without caveat or amendment), as explained at paragraph 7, brings inherent issues of age discrimination – that those called to the Bar before 1 January 2010 are not deemed to be lay persons and those called to the Bar after 1 January 2010 could be deemed to be lay persons. This proposed change in definition for the BSB means that we will treat all unregistered barristers equally, regardless of date of Call.

### **Risk implications**

16. The Internal Governance Rules state that the Board must be comprised of a majority of lay persons and the Chair of the Board must be a lay person. Depending on the response of the LSB to our enquiry about interpretation, even if it was within the letter of the law, it would clearly not be within the spirit - that unregistered barristers would be counted as lay persons and eligible for these posts.



**Bar Standards Board – Director General’s Update – 27 November 2025****For publication****Enforcement Regulations**

1. The Bar Standards Board consultation on revisions to our enforcement regulations closed on 15 October. We were grateful for the many helpful responses which we are now considering with a view to consulting further on detailed draft regulations in Spring 2026.
2. Meanwhile, however, we propose to move ahead immediately to implement one consultation proposal (proposal 1) which does not require a regulation change: namely, to defer drawing up written allegations in cases of alleged serious misconduct until an investigation has concluded. A short summary of feedback on this proposal is attached as annex A. In short, those responding were broadly in favour of the change which was viewed as likely to improve efficiency and to avoid inflexible investigations. We shall be confirming in accompanying guidance that timeframes for the conclusion of investigations will remain in place and that barristers will be free to provide updates or information to the Bar Standards Board at any stage of the investigation.

**Harman**

3. Following publication of Baroness Harman’s report, which we strongly welcome, we have been working closely with our partners on implementation. A small steering group of Board members from the BSB and from the Bar Council has been established to ensure that regulatory and professional responses are mutually informed and complementary. The Bar Standards Board will continue to take independent decisions about regulatory interventions. The Bar Standards Board has also had productive discussions with the Bar Tribunal and Adjudication Service, including about a review of the effectiveness of the tougher sanctions guidance introduced in 2022.

**Mazur**

4. In common with the other front-line legal regulators, the Bar Standards Board has followed closely the Mazur Judgement and follow-up. We are clear that the Judgement does not change the law and that the Bar Standards Board’s existing guidance on the conduct of litigation<sup>1</sup> remains fit for purpose. We have seen no evidence in recent reports about barristers’ conduct that barristers are inappropriately conducting litigation. Nevertheless, we shall consider issuing supplementary guidance to employed barristers and to BSB entities authorised to conduct litigation. We are also working with the Legal Services Board as part of a review of the historic as well as current approach to the issues in Mazur across the regulators.

**Annex**

Annex A - Feedback on the proposal to change the timing of the framing of allegation in the investigation process.

**Mark Neale**

Director General

---

<sup>1</sup> <https://www.barstandardsboard.org.uk/static/5942518a-3f66-49ae-9d7a0f430c12c3e1/0f71837e-bd08-4541-a224003234d30284/Conducting-Litigation.pdf>



## Draft consultation feedback statement: Proposal 1

### Introduction

1. Between July and October 2025, the Bar Standards Board (BSB) held a public consultation on its Enforcement Powers and Procedures (Proposed revisions to the Enforcement Regulations: Part 5 of the BSB Handbook).
2. The consultation paper can be found [here](#). Our analysis of the responses to the consultation is ongoing and will be published in full in 2026. However, we set out in this paper the analysis and response to one proposal which we indicated would be adopted sooner than the publication of revised enforcement regulations in early 2027.
3. In particular, we consulted on a proposal to change our approach to the communication of detailed, written allegations (see Proposal 1), before any regulation changes come into effect. The purpose of this statement is to communicate clearly to the profession and the public that the BSB will now introduce this change, prior to formally amending the regulations.

### The BSB Consultation: Proposal 1

4. Our consultation arose from a comprehensive review and redesign of our end-to-end enforcement process, informed by the recommendations following an independent review of our enforcement system. The proposals formed part of our wider programme to modernise the delivery of our gatekeeping and enforcement functions, ensuring they are efficient, effective and responsive, whilst maintaining the highest standards of quality.
5. In the consultation, we sought views on a proposal concerning the communication of detailed, written allegations (Proposal 1). Under this proposal, we would defer the point at which detailed, written allegations are communicated to the barrister until the investigation is more developed. Deferring the point at which we communicate detailed, written allegations to the barrister will allow the BSB to gather more evidence before drafting particularised allegations, which should reduce delays in the process and lead to a more open-minded investigative approach. We considered that this revised approach is permitted by the current regulations and, therefore, proposed to introduce it without the need for immediate changes to the enforcement regulations. However, in the longer term, we also proposed to amend the regulations to clarify this position.
6. We recognised that this proposal represents a significant change from our current practice. Accordingly, before implementation, the consultation invited views on any practical and legal implications of introducing this new approach, ahead of any formal regulatory change.
7. We indicated that, subject to any feedback, we will implement this proposal once the consultation has closed.



### Summary of responses and next steps

8. We received eight responses to the consultation. Of the responses, two were from individual barristers, one was from a chambers' representative, four were from legal regulatory/representative organisations and one was from a member of the public.
9. There was broad support for our proposal to defer the point at which detailed, written allegations are formulated and sent to the barrister for comment until later in the investigation, once relevant information has been gathered. However, some respondents raised concerns about the timeliness of the process, fairness to barristers and the need for further clarity in BSB guidance. These points are explored in greater detail below.
10. Following the consultation, in summary, we have decided to proceed to:
  - a. **Implement the change in practice** – in line with Proposal 1 – with effect from **1 December 2025**, without any immediate change to the existing regulations.
  - b. **Continue to analyse the feedback** received on the remaining proposals and publish a formal response in 2026;
  - c. With the benefit of the feedback, **undertake a second consultation** next year focusing on drafting changes to the enforcement regulations.
11. Our aim remains to introduce a revised set of enforcement regulations with effect from early 2027, which will include regulations clarifying the new approach to allegations as captured in Proposal 1.

### Response to proposal 1

#### *Enforcement Decision Regulations: Part 5A*

**Question 1. Do you agree with our proposal to defer the point at which detailed, written allegations are formulated and sent to the barrister for comment to later in the investigation when relevant information has been gathered? Please give the reasons for your response.**

**Question 2. Do you envisage any issue (legal or practical) with our proposal to introduce the new approach to the communication of detailed, written allegations, before any change to the regulations? Please give the reasons for your response.**

12. Most respondents were supportive of our new approach to communicating detailed, written allegations. They agreed that this approach has the potential to improve efficiency and avoid a more rigid investigate process – both issues identified in the Enforcement Review.

Part 1 – Public

13. Some respondents expressed concern that the change in approach could impact the timeliness of communicating written, detailed allegations to barristers. They highlighted a potential risk that investigations may “drift” or lose priority, once the initial summary of the potential breaches and relevant underlying facts has been shared. One respondent also noted that any delay in the process could make it more difficult to obtain reliable evidence, with the passage of time.
14. One respondent recommended that barristers should be entitled to provide voluntarily the BSB with a response to the potential breaches at any stage of the process.
15. Several respondents emphasised the importance of clear guidance to support effective implementation of the new approach. They also suggested that clear time limits would promote accountability and ensure fairness to barristers.

*BSB Response*

16. We welcome the depth of feedback provided by stakeholders on this proposal and, having considered the views, we have decided to proceed with the implementation of it as proposed. Our intention is for the new approach to investigations to be effective from **1 December 2025**.
17. We recognise the importance of providing further procedural clarity through updated BSB guidance. In line with the feedback we have produced updated guidance to explain the level of information that will be provided to barristers at each stage of the process and the timeframes that apply. The updated guidance will be published alongside implementation.
18. In relation to the concerns expressed about the impact of Proposal 1 on the timeliness of investigations, our existing overall timeframes for investigating reports will be retained. The timeframe for informing barristers that there is a concern being investigated and the timeframe for providing responses to the investigation will both remain. However, under the new approach, the detailed, written allegations will be communicated at a later stage of the investigation (still within the overall existing timeframe), ensuring that the new approach does not introduce delays or any risk of investigations drifting once barristers have been notified of potential breaches. The guidance on our new approach to allegations will be published alongside implementation, scheduled for 1 December 2025.
19. We agree with the feedback that barristers should be able to provide the BSB with a response to the potential breaches at any stage of the process. Under the new approach, barristers will continue to be entitled to do so prior to the drafting of the detailed, written allegations, but there will be no requirement or expectation that they do. This will be reflected in the updated guidance.

**November 2025**  
**Bar Standards Board**



**Chair's Report on Visits and External Meetings from 1 October – 30 November 2025****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:****Meetings**

6 October	Attended Board away-day
8 October	Met with Anna Bradley (Chair) and Paul Phillip (CEO) Of SRA
22 October	Attended the Board Briefing meeting Attended the Longlisting Panel meeting for Lay Board member
27 October	Attended first meeting of the BC/BSB Harman Review Steering Group
28 October	Attended BSB/LSB 4-way meeting (Chairs and CEOs)
17 November	Met with Master Treasurer, Richard Salter KC, Master Reader, Helen Davies KC, Mrs Justice May and Sub Treasurer, Greg Dorey of Inner Temple
24 November	Met with Lady Justice Andrews, Treasurer of Gray's Inn and Sub-Treasurer Stephen Cartwright
24 November	Attended ISAG meeting and COIC drinks reception
26 November	Attended Broad Briefing meeting
27 November	Attended Board seminar and board meeting

**1-2-1 Meetings**

15 October	Met with Sir Robert Buckland Met with Emma Hopkins, new Treasurer, Lincoln's Inn Met with Malcolm Cree, CEO BC
22 October	Met with Mike Molan, Chair, Central Examinations Board
29 October	Met with Ruth Pickering
31 October	Met with Lord Justice Green, President of COIC
12 November	Met with The Rt Hon. the Baroness Carr of Walton-on-the-Hill, Lady Chief Justice of England and Wales
25 November	Met with Sir Jonathan Cohen
26 November	Met with Interim Chair LSB, Catherine Brown

**Events**

30 September	Attended the Opening of the Legal Year Dinner
1 October	Attended the Westminster Abbey New Legal Year event
22 October	Grand Day Dinner – Middle Temple



## Schedule of Board Meetings Jan 2026 – Mar 2027

### Status

1. For noting and approval.

### Executive Summary

2. The paper sets out proposals for the 2026/27 cycle of Board meetings.

### Recommendation

3. The Board is asked to **agree** the schedule.

### Detail

4. The proposed dates for Bar Standards Board meetings (Jan 2026 – Mar 2027) are:
  - Thurs 29 January 2026 (2 pm) – already diarised
  - Thurs 29 January 2026 (5 pm) – *Board to Board meeting with LSB*
  - Wed 25 March 2026 (5 pm) – already diarised.
  - Thurs 23 April 2026 (5 pm) – *single issue meeting*
  - Thurs 21 May 2026 (2 pm)
  - Thurs 25 June 2026 (9.30 am – 5 pm) (*Board Away Day*)
  - Thurs 30 July 2026 (5 pm)
  - Thurs 1 October 2026 (2 pm)
  - Thurs 26 November 2026 (5 pm)
  - Thurs 4 February 2027 (2 pm)
  - Thurs 25 March 2027 (5 pm)

**Rebecca Forbes**  
**Head of Governance**

**November 2025**