

BAR
STANDARDS
BOARD

REGULATING BARRISTERS

Chambers Monitoring Pilot Scheme

Final Report



March 2009

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A. ACKNOWLEDGMENTS

The success of the pilot scheme owes much to the invaluable support and expertise provided by BDO Stoy Hayward LLP and in particular Stuart May and Simon Day.

We are also indebted to the willing assistance provided by those Chambers selected to take part in the pilot scheme. In all cases, Chambers provided full information about the way in which they operate and those that were visited welcomed the Board's presence and interest in ensuring that Chambers complied with the Code requirements.

Finally, we are grateful to the Education and Training Committee and its Pupillage sub-committee, the Board's Equality and Diversity sub-committee and the staff of the Board and the Bar Council who provided their expert advice during the development of the pilot scheme.

Quality Assurance Committee

March 2009

B. EXECUTIVE SUMMARY

Introduction

Compliance with the Code of Conduct is an important yardstick for standards and important in its own right. Systematic monitoring of compliance by Chambers is a first step in undertaking performance supervision generally. The Chambers monitoring pilot scheme has sought to test one approach to how compliance can be measured on a risk and evidence basis using a representative sample of Chambers. The lessons learned from the pilot will be invaluable in developing future monitoring schemes applicable to other issues and other business models and may be of value to the Board generally in the area of information gathering.

The report

The report details the approach adopted, the results of the pilot and puts forward recommendations and suggestions for how a Chambers monitoring scheme could be advanced.

The main points of note are:

- The development of a self-regulation system which is robust and credible is critical to the profession to protect and maintain its reputation and also the reputation of the Board as a regulator;
- Of those Chambers in the pilot scheme there was only low level evidence of non-compliance and a significant amount of good practice in Chambers was identified. This is encouraging and supports a light touch approach but is no reason to be complacent;
- The use of a questionnaire proved to be a comprehensive method of gathering information from Chambers and should be adapted for future monitoring schemes. However, more work needs to be done to gather information on how Chambers apply policies and procedures;
- Any scheme needs to carry the confidence of the profession. Encouragingly, the large majority of Chambers in the pilot scheme were receptive to the idea of some monitoring of Chambers by the Board, but engagement with the whole profession on the purpose and motives of the scheme is crucial to ensure wholehearted acceptance;

- Chambers must be clear about what is expected of their policies and procedures in order to comply with the Code requirements. This was not always the case for those Chambers in the pilot scheme, particularly in respect of the requirements relating to equality and diversity. Model procedures and policies should therefore be developed to assist Chambers in this regard;
- Any efficient monitoring system must be supported by an increasingly sophisticated and robust IT system which draws information from existing databases into a central point so that risk assessment and analysis can be carried out;
- The Quality Assurance Committee should be commissioned to review the pilot scheme and to put forward proposals, in the light of the lessons learned, for the effective implementation and operation of a monitoring scheme.

Conclusions

Code compliance by Chambers appears to be in relative good order. There is always room for improvement both in terms of how that is determined systematically and how compliance is maintained. Momentum must not be lost and the next stage of development should be developed and publicised by July 2009 at the latest.

C. INTRODUCTION TO THE SCHEME

Objective

1. The Bar is the subject of conduct provisions regarding complaints, pupillage and diversity all of which impact across sets of Chambers as a whole. The public is entitled to expect that the existing provisions will be enforced. They impact upon the service provided to the public and cannot properly be left simply to reactive investigation following complaint.
2. Accordingly in December 2007 the Bar Standards Board (the Board) committed to developing a quality assurance scheme to monitor compliance by Chambers with the Code of Conduct with a view to the scheme's implementation in 2010.

Scope and purpose of the scheme

3. At present the Board is reliant on information received on Chambers' non-compliance with the Code through complaints and other referrals. There is no mechanism for gathering information to ensure compliance. It is intended that the scheme will fill this gap and will enable the Board for the first time to identify systematically Chambers which comply with the Code and, where necessary, take remedial steps to address non-compliance.
4. The scheme will initially seek to ensure that Chambers are meeting the basic requirements of the Code of Conduct in the areas of complaints, pupillage and diversity. Where non-compliance is identified, it will seek to help Chambers to raise standards and to improve their procedures. Disciplinary action for persistent non-compliance will be a last resort.
5. The scheme will also play an important role in the future development of quality assurance across the Bar; it will help to raise standards of practice and Chambers' administration through the sharing of best practice and targeted recommendations for improvement.

The pilot

6. Before launching a monitoring scheme for all Chambers, the Board decided to conduct a pilot scheme to test the proposed approach to Chambers monitoring and tasked the Quality Assurance Committee with the administration of the pilot. The Committee, in turn, established a steering group to undertake the more detailed work on the pilot.

Membership of the Group appears at **Annex A**. The steering group decided that the pilot scheme would involve a representative sample of 35 sets of Chambers. The pilot scheme commenced in June 2008 and concluded in November 2008. This is the report of the pilot scheme.

The purpose of the pilot scheme

7. While in many cases, it may be neither appropriate nor proportionate for there to be detailed monitoring of Chambers' administration, there are areas where formal monitoring may be required as a matter of public protection or importance.
8. Before implementing any monitoring system for all Chambers, the Board decided that it would be wise first to test its proposed approach to monitoring on a representative sample of Chambers to determine whether its approach was proportionate and adequate to carry public confidence and at the same time not be excessively bureaucratic.
9. Any final monitoring scheme developed will need to be applicable to all Chambers irrespective of geographical location, area of practice or size. The pilot scheme, using a representative sample of Chambers, enabled the monitoring approach to be tested in a live environment and against each of these parameters so as to permit the Board to determine that the proposal was worthwhile and to permit the scheme to be finalised in the light of experience, feedback and learning.

The scope of the pilot

10. The scope of the enquiries addressed by the pilot were as follows:

(i) Chambers complaints handling

The Code of Conduct requires Chambers to have, and make available upon request, a complaints procedure. Detailed research¹ was undertaken in 2005 into the effectiveness of complaints handling by Chambers. This is the first point of contact for any disappointed consumer. At the time of the pilot, and in the light of this research, the Board was in the process of strengthening the existing requirements on Chambers and developing complaints handling training for Chambers. It was therefore an ideal area of compliance to be included in the pilot scheme.

¹ Research undertaken by Dr Debora Price as part of a review of chambers complaints handling conducted by the Carr Working Group

(ii) Pupillage

Historically, visits to Chambers have been undertaken to review the pupillage arrangements where concern has been identified or raised about the procedures adopted by particular Chambers. A large amount of information and experience has therefore built up on a range of compliance issues relating to pupillage. There are clear requirements in the Code of Conduct requiring Chambers to ensure, for example, that they are run in an equitable and fair manner for all barristers and pupils. In addition to the Code requirements there are certain administrative procedures relating to pupillage which the Board expects Chambers to adopt.

(iii) Equality and diversity

There are statutory requirements imposed on Chambers in respect of equality and diversity which are incorporated into the Code of Conduct. Further, the Bar Council's Equality and Diversity Code outlines good equal opportunities practice in Chambers.

Methodology

11. The Board is committed to the operation of risk-based regulation². It concentrates its efforts on those areas where the public is most at risk or demands standards which require supervision by the regulator. Risk assessment is critical to the pilot scheme and to the eventual scheme for all Chambers. It will enable a proportionate and targeted approach to be adopted for each set of Chambers depending on the level of risk that a particular non-compliance issue demonstrates.

Appointment and role of consultants

12. Broad experience of the principles relating to, and the application of, risk in a regulatory context were essential to the development of the pilot. Whilst the Group had a wide understanding of the Bar, it lacked the same level of knowledge when it came to practical risk assessment. As a result, a tender exercise was undertaken which invited expressions of interest from suitable consultants or consultancy firms to assist in the development of the scheme. BDO Stoy Hayward LLP were appointed. Their role was to advise on how risk assessment could be applied to the pilot scheme and to assist generally in the development and operation of the pilot. The terms of reference of the consultants are attached at **Annex B**.

² Bar Standards Board Strategic Plan 2007-2009

Background research

13. To assist with the development of the pilot research into the experience of other regulators into these procedures was undertaken. Amongst others, a review of the Solicitors Regulation Authority and the Financial Services Authority's approach to risk assessment was undertaken. The main points which arose were:

- (i) All of the regulators rely on risk assessment to inform their monitoring systems;
- (ii) The procedures are dependent upon a reasonably sophisticated IT system;
- (iii) Adequate human resources are required for the system to be effective and so that the system is capable of reacting promptly when required;
- (iv) Accurate information is essential, so that precise records are available and comprehensive assessment can be undertaken;
- (v) Memoranda of Understanding may be beneficial between the regulator and other related bodies and firms to enable a complete picture to be built up on compliance and risk.

D. MONITORING PROCESS/METHODOLOGY

Selection of the pilot sample

14. The pilot scheme used a representative sample of 35 sets of Chambers (approximately 10% of the total number of Chambers, excluding sole practitioners). The sample was selected to achieve a fair representation of Chambers across England and Wales. The sample took into consideration size of Chambers, practice area and geographical location. Participation was compulsory.

Development of the questionnaire

15. In order to gather information from Chambers, a questionnaire was developed which covered the main issues of compliance in each of the three areas included in the scheme.
16. The questionnaire sought not only copies of the procedures and policies in relation to complaints handling, pupillage and equality and diversity, but also information concerning how those procedures/policies were made available and applied.
17. The questionnaire was developed with input from staff, committees and other experts within each of the three fields. It covered compliance with the Code of Conduct and also sought information on particular demonstrations of good practice.
18. Chambers were encouraged to complete and return their questionnaires online via a 'portal' developed and hosted by BDO.³
19. The questionnaire used for the pilot scheme is at **Annex C**.

Risk framework and process for determining which Chambers to be visited

20. Each of the requirements in the Code for each of the three areas was ranked according to the risk to the profession and the public interest of non-compliance. The questions covering each of the three areas were weighted in relation to their relative risk should non-compliance be identified. For example, the requirement to have a complaints policy was weighted as high risk, whereas less absolute requirements such as a requirement to identify training needs through the analysis of complaints received were weighted as lower risks.

³ 13 of the Chambers involved in the pilot scheme used this facility. The remaining Chambers returned a hard copy of the questionnaire and supporting documentation.

21. The development of the risk framework enabled the completed questionnaires to be evaluated to ensure that the response was proportionate to the risks associated with any non-compliance.
22. The same 'weighting' system was also applied in relation to good practice. A number of questions were identified where a positive answer would suggest that Chambers might be demonstrating good practice.
23. After consideration it was decided that 15 of the 35 Chambers would be visited as part of the pilot scheme. Chambers were automatically selected for visit if they, following the risk assessment, had a rating of medium or above in one or more of the three areas. This amounted to five sets of Chambers.
24. An important part of any monitoring system is the need to verify the accuracy of the information provided. To that end, seven Chambers were selected for visit in order to verify the information which was provided in the questionnaire and to see how this translated into practice and procedure within Chambers. Chambers were selected here with regard to the need for an appropriate spread of types of chambers.
25. In addition, one set of Chambers was visited because of their failure to return a completed questionnaire and two sets of Chambers were visited because they demonstrated good practice in relation to one or more of the areas monitored. As a result we are satisfied that a broad and representative sample of the Chambers involved in the pilot was visited.

E. CHAMBERS VISITS

Approach to Visits

26. Heads of selected Chambers received a letter giving the option of three dates and times for a visit. The letter also asked for the Head of Chambers or Senior Clerk (or equivalent) to be available on the day of the visit to review the questionnaire in detail, and requested that they could arrange for the individuals with lead responsibility for complaints handling, pupillage and equality and diversity to be available. For those Chambers offering pupillage the opportunity to speak to a pupil was requested.
27. BDO Stoy Hayward conducted the visits over a five week period from 29 September 2008 to 31 October 2008. In each case a member of the Board, Board staff, or both also attended.
28. Each visit commenced with Chambers being given the background and purpose of the pilot, why they had been selected and what would happen following the completion of the visit. The importance of their feedback on the pilot process was stressed.
29. The structure of the remainder of each visit differed depending on the issues arising from individual questionnaires. Visits generally took the form of a detailed discussion of the response to the questionnaire and supporting documentation that had been provided, probing areas of interest, ambiguity or concern, examining evidence of compliance with procedures and offering advice and suggestions for improvement.
30. In some instances where a pupil (or ex-pupil) was available (which was the case in three Chambers), it was possible to ask questions regarding their experience of pupillage with no staff or members of Chambers present.
31. Where areas of good practice were indicated in the questionnaire they were acknowledged and explored with Chambers in detail.
32. A short report was prepared for each Chambers following completion of the visit. This included:
 - (i) an overall assessment of the level of compliance with the Code of Conduct;
 - (ii) specific recommendations for improvements to ensure compliance, along with a target date for implementation;
 - (iii) observations of issues on the general administration of Chambers which although not impacting on compliance, might be improved; and
 - (iv) a recognition of specific good practice identified during the visit.

33. The report was issued with a short feedback form to obtain Chambers' views on the pilot scheme.

Summary of Outcomes

34. The visits were received in a positive and welcoming way by Chambers in the majority of cases.
35. Chambers were not always able to make all the requested individuals available for the visit. However, in every case it was possible to discuss identified issues satisfactorily with those who were present.
36. The results of the visits demonstrate that compliance with the Code is generally strong. The majority of Chambers were aware of the requirements of the Code and had appropriate processes in place to ensure compliance. However, there was some evidence of inadequate compliance, in particular, in the area of equality and diversity.
37. It should be noted that, in general, smaller Chambers with fewer staff and resources did not have in place the same level of sophistication in terms of systems and processes as the larger Chambers. Generally, areas of non-compliance were concentrated in this group of smaller Chambers.
38. Some of the key findings to emerge from the three areas under examination are set out below:

Complaints

- (i) In nearly all cases Chambers had a written complaints policy in place. There were inconsistencies in Chambers' definition of a 'complaint', and the quality of that definition. This could render the decision to record individual expressions of dissatisfaction as a complaint entirely subjective. Whilst it may be difficult to produce an all encompassing definition of a complaint, it was apparent that Chambers would welcome clarification from the Board on what they expect Chambers to treat as a complaint.
- (ii) There are opportunities for complaints recording and monitoring to be improved to facilitate the identification of trends and issues, and to improve organisational learning. More consistent recording of "grumbles" and issues reported by clients to the clerks' room may assist this.
- (iii) Many Chambers had adopted the Board's model procedure for complaints handling. In addition, there was some good practice identified, for example, one set of Chambers had developed a standard complaints form and monitored

complaints to identify training needs and to improve Chambers' processes and administration.

Pupillage

- (i) 13 of the Chambers visited offered pupillage. A number of smaller Chambers that had previously offered pupillage were no longer doing so. The main reasons given were the cost of funding pupils and a lack of work opportunities for the pupil.
- (ii) Compliance concerning pupillage was generally considered good. All Chambers that offered pupillage had a pupillage policy in place. A number of examples of good practice were evident, particularly in relation to the selection, training, mentoring and appraisal of pupils.

Equality and Diversity

- (i) This area produced the greatest amount of non-compliance.
- (ii) It was clear from a number of the visits that the role of the Equal Opportunities Officer has not been defined or developed in many Chambers. Chambers would benefit from a model "job description" for this role.
- (iii) Equality and diversity training is not being taken up by staff or members on any great scale. This could be because there is a lack of suitable training, an issue which the Board should address.
- (iv) Some equality and diversity policies were inadequate. There were particular issues regarding insufficient detail for, or no mention of, parental leave and flexible working. These issues give rise to a number of difficulties in a Chambers structure and Chambers would benefit from clear guidance in the form of a model policy.
- (v) Diversity data is not being consistently collected and monitored across Chambers.

39. A detailed breakdown of results is attached at **Annex D**.

40. A further outcome from the visits, and an important added benefit to the Board, was that it gave the Board representatives an opportunity to explain the work of the Board. This appeared particularly successful in the provincial sets of Chambers visited, where the Board is perceived to be distant.

F. ANALYSIS OF THE PILOT SCHEME

Project Initiation Document (PID)

41. The PID for the pilot scheme set out the features for a successful pilot. It is useful to refer to these and to analyse the scheme against them. The features were:

- Level of engagement with Chambers
- Costs of implementation
- Quality of data/information collected
- External environmental issues (such as changes to the Code of Conduct or external regulation)

Level of engagement with Chambers

42. Engagement in the pilot was seen as key to ensuring acceptance of the process by Chambers and essential as a step towards acceptance of the need for a compliance scheme by the wider profession. For optimum operation any scheme needs the confidence of the profession. This requires clarity about the aims of the scheme and what is expected of Chambers.

43. All Chambers selected for the pilot scheme were provided with detailed information on the purpose and scope of the scheme and were advised as to what would be expected of them during their involvement. Chambers were offered the opportunity to meet with members of the Steering Group to discuss the pilot scheme. None took up this offer. Two Chambers contacted the Board's staff for further information on the scheme but in broad terms it would seem that those Chambers selected for the pilot were clear about the purpose of the scheme and their role within it.

44. Following the completion of the questionnaire, those Chambers not selected were thanked for their assistance and invited to provide feedback on the pilot. Feedback was received from one set of Chambers who felt that the questionnaire was clear and easy to complete.

45. An overview of the Board's objectives for the scheme and an explanation of the desire for the development of an all Chambers scheme were provided at each of the visits to Chambers.

46. Those Chambers selected for visit were provided with information about the visit, what it would cover, who would be attending and why they had been selected. Following each

visit a compliance report was issued to each Chambers which outlined the visit and the recommendations that arose. It also reported good practice identified during the visit. These Chambers were also invited to provide feedback on the pilot.

47. It was apparent during the visits that some Chambers were not sufficiently clear about the aims and purpose of the pilot scheme. Further, a minority were resistant to the idea of a formal monitoring scheme for Chambers at all. It was argued by these Chambers that the BSB should be focussing not on whether they had written policies but instead on the quality of legal services provided by Chambers. A scheme which centred on policies and procedures may give an inaccurate picture of how effectively Chambers operates.
48. It is clear, therefore, that there is still much work to be done on communicating the aims and objectives of the Board in monitoring Chambers for compliance with the Code. Support from Chambers is achievable but the Board will need to develop a communication strategy. Such a strategy could include:

- (i) Liaison with the Legal Practice Managers Association and the Institute of Barristers Clerks;
- (ii) An article in Counsel giving a variety of perspectives on the scheme from those involved in the pilot (including Chambers who participated);
- (iii) Road shows.

Costs of implementation

49. A monitoring scheme for all Chambers will be a major initiative which will require adequate resources (both staff and money) and IT infrastructure for it to be delivered effectively.
50. It is recommended that the next step in the development process will be to consider the options for the scheme and to assess the likely costs attached to each approach. A number of fundamental questions will need to be addressed before any firm view can be reached on the cost of implementing an all Chambers scheme, including:
- (i) The nature of monitoring required.
 - (ii) The frequency of such monitoring (annually or less often?)
 - (iii) Who should conduct any monitoring visits (in-house staff or external consultants)?
 - (iv) What IT infrastructure will be required?

51. It is proposed that the Quality Assurance Committee should now be commissioned to consider the implementation of the all Chambers scheme and report to the Board with detailed proposals and figures.

Quality of data/information collected

52. The questionnaire requested that copies of Chambers' policies and details of how they were applied be supplied. On the basis of information provided in the questionnaire, the risk assessment of Chambers was undertaken. It is hoped that experience will enhance the possibility of reducing inspections as confidence in risk identification increases.

53. It was essential that the questionnaire should ask questions designed to ensure that all relevant material was provided by Chambers. This permitted an informed decision to be reached on each Chambers concerning the likely risk to the public and the reputation of the profession.

54. In broad terms, it is considered that Chambers provided sufficient information for effective risk assessment to be conducted. However, it is clear that there are further questions that could be asked in future in order to amplify some of the relevant issues. For example, a number of Chambers answered that they had an equal opportunities officer as required by the Code of Conduct. Yet, during the visit, it was apparent that, whilst Chambers had such an officer, they were unsure of their role and/or were not active in Chambers in promoting equality or in ensuring that Chambers' policies reflected the current legislative requirements. An incomplete picture was therefore obtained from the information provided by Chambers on the current questionnaire.

55. Similarly, most Chambers answered that they had a complaints policy but when this was explored during the course of a visit, it became apparent that there was an inconsistent approach to handling complaints within Chambers.

56. Further, it is evident that there are issues not covered in the questionnaire that need to be included so that a rounded view of Chambers' compliance can be obtained. This includes further information on:

- (i) Recording of informal complaints
- (ii) Retention of pupils
- (iii) Pupillage assessment
- (iv) Content and effectiveness of equality policies and the extent to which such policies are implemented in practice.

57. On balance, it is considered that the quality of information provided was such as to allow a reasonably accurate risk assessment of Chambers. All of those Chambers identified during the pilot as being sufficiently high risk to require a visit were confirmed as being non-compliant during the visit itself. However, as highlighted above, the visits unearthed some issues that were not identified by the questionnaire, either because the relevant question was not asked or because it was not sufficiently clear. For example, there was a lack of clarity on how Chambers should use monitoring data to address under-representation of particular groups within Chambers. Further work is therefore required on the development of a more complete questionnaire as the monitoring scheme for all Chambers progresses.

External environmental issues

58. The results of the pilot scheme do not suggest that the Code of Conduct in the three areas included within the scheme is inadequate to protect the public interest.

59. What was apparent was that there is a lack of clarity in Chambers about what is required to meet the terms of the Code. In many cases, Chambers who complied with the basic requirements by, for example, having an equalities policy, were unclear what else was expected of them to apply the policy and disseminate information within Chambers. On the other hand much work has been done in relation to complaints handling by Chambers and, having received guidance and model procedures, Chambers were able to demonstrate consistency of compliance to a high standard. Similar approaches would be beneficial for other aspects of compliance.

60. It is recommended therefore that, as part of the development of a scheme for all Chambers, material is produced which clearly sets out what is expected of Chambers for each of the areas monitored and provides sample procedures and examples of good practice.

G. OUTCOMES

61. This section of the report outlines the general outcomes of the pilot including feedback from those Chambers involved in the pilot scheme and those staff, Board and Committee members who accompanied BDO on visits. It is broken down in to each of the key stages of the pilot process. In addition, this section sets out the wider benefits to the Board that have arisen from the pilot scheme and which are likely to arise from an all Chambers scheme.

Risk assessment - Collection of information/data

62. The questionnaire provided the primary means of collecting information from Chambers. Its aim was to elicit from Chambers all of the necessary information for a comprehensive assessment of compliance to be undertaken and so that Chambers could be assessed on their likely risk of non-compliance adversely affecting the public interest. It was developed with the assistance of relevant Board committees and staff in each of the three areas of the scheme.

63. By 'weighting' each of the questions in the questionnaire according to their relative non-compliance risk to the public and the reputation of the profession, BDO, with support from the relevant Board committees and staff, developed a risk framework against which the information collected from Chambers could be assessed.

64. As not all Chambers that completed the questionnaire were visited, we cannot give a definitive view of whether the information gathered was sufficient to reach an absolute decision on each Chambers' respective compliance. However, where the questionnaire results indicated potential non-compliance or minimum compliance this assessment was supported during the visit. Those Chambers who scored medium on a risk rating in a particular area, when visited, demonstrated partial or non-compliance with the Code requirements.

65. Similarly, by selecting a number of Chambers for visit to verify the information provided by them, it was possible to determine whether the questionnaire that they had completed allowed for an accurate assessment of their likely risk. Again, where, in the light of assessment, low risk (or no risk) was found, this was confirmed during the course of the visit; where Chambers appeared to be compliant on paper this proved to be the case in practice.

66. So, is a questionnaire the ideal approach? A definitive answer cannot be provided. On the basis of this pilot, we have confidence that the questionnaire provided sufficient information for a reasonably accurate risk assessment to be undertaken. Yet, any

process that relies on self-assessment has an element of risk attached to it, the results are reliant on the accuracy (and the honesty) of the participant. To provide sufficient confidence overall, random selection for visit, coupled with firm action where inaccurate information has been provided, is essential.

67. A further factor to consider is the relative low risk of Chambers. The pilot did not unearth major non-compliance issues nor are there many complaints received in respect of Chambers' administration. A heavy-handed approach to Chambers monitoring arguably would appear to be disproportionate.
68. It is therefore suggested that a compliance questionnaire, coupled with information on other aspects of regulatory relevance such as CPD compliance and practising certificate renewals, should provide sufficient data for a rounded and informed view to be taken on Chambers' risk.

Chambers Visits

69. BDO led the visits to provide expertise and independent input. The outcomes of these visits are detailed in section E of this report. At all visits, BDO were accompanied by either a member of staff or a member of the Committee or the Board.
70. It is right to record that BDO started with limited knowledge of the Bar and its practices. Their understanding has been developed over the currency of their consultancy but there were some minor reservations that this might not be adequate. This potential concern was weighed up against the benefit brought by impartial assessment by independent consultants. In the light of this, a key aspect of the feedback on the pilot scheme was whether, taking the above in to account, it was right for BDO to conduct the visits. BDO, the Chambers visited and those that accompanied BDO during the visits were asked for their views.
71. In broad terms, all agreed that this was the right decision and that the visits worked well. BDO felt that they benefitted from being accompanied by a Board representative who could explain the purpose of the scheme and deal with queries relating to other aspects of the Board's work that arose during the visit. Chambers who provided feedback endorsed this view and found BDO to be professional, informed and balanced in their handling of the visit. Those that accompanied BDO on the visits also felt that it was the right approach. They agreed that it was important to have someone from the Board present to explain the process and the Board's motivation for introduction of such a programme. All were impressed by BDO's tone and approach to the visits.
72. In the light of the comments received and as outlined above, it would appear that the approach adopted for the visits worked. BDO provided the independence necessary to

give the scheme balance and credibility but the presence of Board representatives was also valuable.

Final report

73. The final report produced following each Chambers visit provided a summary of the main points discussed during the visit and set out, where necessary, recommendations for remedial steps to be taken by Chambers where non-compliance was apparent. Examples of good practice were also provided.

74. An example of a final report is attached at **Annex E**.

75. Feedback on the final report was requested from each Chambers. Specifically, Chambers were asked whether the report was sufficiently detailed. Of those Chambers that responded, there was broad consensus that the report was adequate. In setting out on the front page whether Chambers was compliant it provided a quick reference to whether any remedial action was required. Chambers also welcomed the fact that good practice examples were included in the report as this provided a balance to the negative aspects of a compliance scheme.

Added benefits

76. The pilot scheme was one of the first times that the Board has had any presence in Chambers outside of the complaints regime and it is the first time that it has collected wide ranging information on how Chambers operate and discharge their obligations under the Code. Not only has this provided a snap-shot of compliance of a representative sample of Chambers but it has also enabled the Board to identify some good practice in each of the three areas covered. This data is invaluable and not just for the purposes of the pilot scheme. It has provided the Quality Assurance Committee with a better understanding of how Chambers function. It is hoped that this can also be used to better inform the Board as it develops its policy and practices in other areas of its work. For example, the good practice identified in pupillage may be useful to the Pupillage Review currently being undertaken by the Education and Training Committee and the problems relating to awareness of the role of the Equal Opportunities Officer within Chambers and the lack of model policies and procedures can be directed to the Diversity Committee.

77. It is not only those involved in the three areas covered in the scheme that will benefit from the information gathered both from the questionnaire and during the visit. Comments made in relation to the Code of Conduct (namely that it was difficult to follow

and unwieldy) can be referred to the Standards Committee for the purposes of their comprehensive review of the Code.

78. To obtain maximum benefit any future compliance scheme needs mechanisms to allow for the information collected to be utilised across the board. This has the added benefits of wider engagement with the profession and the development of better links with them and, equally important, should help to avoid duplicating requests for information.

H. FUTURE DEVELOPMENT OF THE SCHEME

Next steps

79. The Board has committed to developing a monitoring scheme for all Chambers by 2010.

This report has provided an example of how such a scheme might operate and there are lessons to be learned from the pilot when implementing any future scheme.

80. It is not the purpose of this report to set out what those next steps are. However, in the light of the pilot scheme the following is recommended:

Data collection/risk assessment

- (i) A questionnaire (adapted and shortened from the version used in the pilot scheme) should be used as the primary means of gathering information from Chambers;
- (ii) Risk should continue to be of paramount importance to ensure a proportionate and targeted approach to monitoring;
- (iii) There must be a verification element to the scheme to encourage Chambers to provide accurate information on how they operate and comply with the Code;
- (iv) Each of the BSB's committees should commit to referring relevant information on Chambers to the Quality Assurance Committee so that a comprehensive picture of Chambers compliance can be established and to inform the monitoring scheme's development.

Engagement with the profession

- (i) A communication strategy should be developed so as to engage with the whole profession on the purpose and motives of the scheme;
- (ii) Model procedures and policies clearly setting out what is expected of Chambers should be produced.

Chambers visits

- (i) Before each visit Chambers should be informed who should be available for the visit, what will be covered and whether there are any particular non-compliance issues that will be discussed;

- (ii) Consideration should be given to the visits being conducted by an independent assessor but with a Board presence at each session;
- (iii) Standard forms need to be developed for the visits themselves to ensure consistency of approach.

81. This list is not exhaustive but seeks to highlight the main issues that arose from the pilot scheme and which should be considered during the next phase of development.

The role of IT in an effective monitoring system

82. IT has yet to be discussed in this report. It is clear that any efficient monitoring system must be supported by an increasingly sophisticated and robust IT system which draws information from existing databases into a central point so that risk assessment and analysis can be carried out.

83. Chambers should be able to complete the questionnaire on a secure on-line facility and there should be a mechanism for letters and reports to be sent and diary entries and reminders provided via a centralised database.

84. Early discussions have been held with both the Bar Council's IT Manager and BDO about how such IT systems can be developed. We have also discussed how other regulators' systems work. It is evident that without an adequate IT platform in place it will not be possible to develop a robust and economic monitoring scheme for Chambers.

85. Consideration should be given as to how the IT provision for the system can be arranged. There are a number of options including the development of an in-house database linked to the existing IT framework and the external development of a system which feeds in to the current IT systems employed by the Board and the Bar Council. Both of these options require careful thought. Cost, on-time delivery and expertise also need to be taken into account.

I. CONCLUSIONS

86. The main conclusions are:

- The Quality Assurance Committee considers that the pilot scheme has been a success. It was delivered on a rigorous budget and has been generally well received by those Chambers involved as being necessary and not unduly burdensome. The input of BDO has been valuable in giving the scheme external credibility and independence and their expertise has been critical to the risk assessment process adopted.
- Of those Chambers in the pilot scheme (which was a representative sample of the profession), there was only low level evidence of non-compliance and a significant amount of good practice in Chambers was identified. This is encouraging but no reason to be complacent.
- We have a good measure of confidence that our sample provided a reliable cross section of Chambers.
- The development of a self-regulation system which is robust and credible is critical to the profession to protect and maintain its reputation and also the reputation of the Board as a regulator.

87. Now that the pilot scheme has concluded, it is important that momentum is not lost. The next stage of implementation should be publicised by July 2009 at the latest. To that end, the Quality Assurance Committee seeks the Board's sanction to review the pilot scheme and to put forward proposals to the Board for an effective implementation and operation of a monitoring scheme. These proposals should consider in particular:

- Whether the next stage should be universal or a phased roll out based on risk?
- Should the same areas covered in the pilot scheme be included in the next stage of development or should other issues of compliance be considered?
- Whether the monitoring scheme should be developed to cover the whole profession, including employed barristers and sole practitioners?
- How should communication strategy/engagement with the profession best be approached?
- How, and by whom, should assessments be conducted?
- How, and by whom, should the IT provision be delivered?

- How should good practice be shared?
- How should the information gathered from Chambers be shared across the Board's work?
- What is the cost of implementation?

88. The Committee should produce these proposals for consideration by the Board no later than June 2009, with the intention to implement in 2010.

89. Code compliance by Chambers, on the face of it, seems to be in relative good order.

There is always room for improvement both in terms of how that is determined systematically and how compliance is maintained.

Quality Assurance Committee

March 2009

Members of the Chambers Monitoring Steering Group

Michael Pooles QC	Board member and Chair of the Quality Assurance Committee
Vicki Harris	Board lay member and Vice-chair of the Quality Assurance Committee
Sam Stein QC	Barrister member of the Quality Assurance Committee
Edith Robertson	Practice manager and member of the Quality Assurance Committee
Oliver Hanmer	Head of Standards & Quality at the Bar Standards Board

Consultant Terms of Reference

Terms of reference:

- To work with the BSB's Quality Assurance Committee in the development of a pilot scheme to monitor chambers compliance with the Code of Conduct, professional standards and best practice principles including advising on:
 - The scope, strategy and procedure for the pilot scheme;
 - The development of a project plan for the pilot scheme;
 - The assessment of the information and data currently available;
 - Risk assessment;
 - The creation of a risk assessment framework;
 - The selection of chambers to be involved in the pilot scheme;
 - The collection of information from, and about, chambers involved in the pilot scheme;
 - The development of procedures to assess the information collated against the risk assessment framework
- To work with the Quality Assurance Committee in producing a report to the Board on proposals for how the pilot scheme will operate.

Bar Standards Board - Chambers Monitoring Pilot Questionnaire

Please answer all the questions on this form, unless otherwise directed. Where tick boxes are provided, please tick all that apply. Questions that require a more detailed, discursive response should be answered as fully as possible. Where example documents are required, please provide them with your completed questionnaire, and reference them to the appropriate question.

Please note that the questions in italics relate to best practice Chambers' administration rather than mandatory requirements.

About Chambers

Name of Chambers:

Name of Head of Chambers:

Name of Chambers Director / Manager or Senior Clerk:

Number of Tenants:

How long has Chambers been in operation?

Fewer than 5 years: 5-10 years: more than 10 years:

Area of specialism:

(please check all that apply):

- Admiralty and Shipping
- Banking and Finance
- Communications
- Company, Commercial and Competition
- Constitutional and Administrative
- Construction and Utilities
- Crime
- Dispute Resolution and Arbitration
- Employment
- European, Foreign and International
- Family Law
- General Chancery
- General Commercial
- Human Rights
- Insurance
- Immigration
- Intellectual Property
- Landlord and Tennant
- Litigation
- Local Government and Public Services
- Personal Injury and Torts
- Private Client
- Professional Negligence
- Property
- Public Law
- Revenue
- Taxation and Duties
- Other (please specify below)

1. Chambers Complaints Handling

Policy

1.1 Does Chambers have a complaints policy?

Yes:

No:

1.2 If yes, please provide a copy.

1.3 If no, please provide an explanation below of why no policy is in place.

Communications

1.4 How and when is the policy made available to clients?

1.5 How and when is the policy made available to instructing solicitors?

1.6 How and when are complainants informed of the complaints process?

Dealing with Complaints

1.7 *How does Chambers decide what is a formal complaint?*

1.8 What process is followed when a complaint is received?
(Please provide a brief description or attach relevant papers)

1.9 What process is followed for investigating complaints?
(Please provide a brief description or attach relevant papers)

1.10 What process is followed for complaint resolution?
(Please provide a brief description or attach relevant papers)

1.11 *Is there an independent means of monitoring the investigation of complaints?*

Yes:

No:

1.12 If yes, please provide details.

1.13 If no, please explain how Chambers ensure that complaints are properly handled.

Records, Statistics and Learning

1.14 Do you record all complaints received?

Yes:

No:

1.15 If no, how do you determine which complaints should be recorded?

1.16 How many complaints did Chambers receive in the last 12 months?

1.17 How many were disposed of in each of the following ways:

a. conciliated

b. fee reduction

c. other (please describe below):

1.18 *What systems do you have in place to identify recurrent issues in complaints?*

1.19 *If you have these systems in place, please provide an example of steps you have taken to improve systems or procedures as a result of identifying an issue?*

1.20 *Does Chambers use complaints to identify training gaps either in Chambers staff or its members?*

Yes:

No:

1.21 *If so, please give an example of how this has worked in practice?*

2 Pupillage

Background

2.1 Does Chambers offer pupillage?

Yes: No:

(if no please go to section 3)

2.2 How many pupils does Chambers have at present?

2.3 For how long has Chambers taken on pupils?

Fewer than 5 years: 5-10 years: more than 10 years:

Policy

2.4 Is there a Pupillage Policy in place?

Yes: No:

2.5 If yes, please provide a copy.

2.6 If no, please provide an explanation of why no policy is in place.

2.7 Does the Pupillage Policy set out Chambers' policies in relation to:
(check all boxes that apply)

- a. the number and type of pupillages on offer?
- b. recruitment of pupils?
- c. the roles and duties of pupils?
- d. the roles and duties of pupil supervisors?
- e. the checklist(s) used during pupillage?
- f. arrangements for funding, including payment of expenses?
- g. Chambers' policy on the payment of clerks' fees, rent and other expenses during the practising period of pupillage?
- h. the recruitment of tenants and when prospective tenants will be notified of tenancy decisions?
- i. holiday entitlement?
- j. pupils not taken on as tenants?

2.8 If any of boxes a-j are un-ticked, please provide an explanation of why they are not covered in the policy.

2.9 Are pupils provided with Chambers' policies on:
(check all boxes that apply)

a. Complaints and Grievances?

b. Equality and Diversity?

Vacancies and Selection

2.10 Does Chambers advertise all pupillage vacancies?

Yes: No:

2.11 Are they advertised on the website designated by the Bar Council?

Yes: No:

2.12 How are candidates made aware of the pupillage selection procedure?

2.13 *Does Chambers monitor and assess the effectiveness of a recruitment exercise?*

Yes: No:

2.14 *If no, please explain why not.*

2.15 *If yes, please give examples of action taken to improve the effectiveness of the recruitment process, as a result of this assessment.*

Training, Progress and Supervision

2.16 *Does Chambers ensure pupils are provided with an objective assessment of their progress at regular intervals throughout pupillage?*

Yes: No:

2.17 *If no, please explain why not.*

2.18 What process is adopted by Chambers at the end of pupillage assessment to decide whether or not a pupil should be signed off?

2.19 What processes are in place to manage complaints and grievances by pupils and pupil supervisors?

2.20 What is the method for fairly distributing briefs and other work amongst pupils?

2.21 *Is there a structured training programme in place for written work?*

Yes: No:

2.22 *If yes, please provide a copy.*

2.23 *If no, please state why.*

2.24 *Is there a structured training programme in place for advocacy?*

Yes: No:

2.25 *If yes, please provide a copy.*

2.26 *If no, please state why.*

2.27 The checklist requires pupils to obtain a wide variety of work experience. How are pupils given appropriate opportunities to enable them to complete the checklist?

2.28 Do pupil supervisors ensure that checklists are completed:
(check all boxes that apply)

- a. correctly?
- b. promptly?
- c. and are signed off?

Funding

2.29 Are pupils funded in accordance with The Pupillage Funding and Advertising Requirements 2003?

Yes: No:

2.30 If no, please state why

Pupil Supervisors

2.31 Are all pupil supervisors accredited by their respective Inns of Court?

Yes: No:

2.32 What external training have pupil supervisors received?

2.33 *What additional training and support is provided to pupil supervisors within Chambers?*

2.34 *How do you monitor the effectiveness of pupil supervisors?*

2.35 *Are pupils asked to provide confidential feedback on their pupil supervisor?*

Yes: No:

2.36 *If yes, what use is made of that information?*

Registration

2.37 Have all pupils registered their pupillage with the Bar Standards Board?

Yes: No:

2 Equality and Diversity

Policy

3.1 Does Chambers have a written Equal Opportunities Policy?

Yes:

No:

3.2 If yes, please provide a copy.

3.3 If there is no stand-alone Equal Opportunities Policy document, are equal opportunities policies integrated into other policies (such as recruitment or complaints policies)?

Yes:

No:

3.4 If the policy is integrated, please specify into which other policies (and provide copies).

3.5 If you have answered no to both 3.1 and 3.3, please provide an explanation of why there are no written policies in place.

3.6 Do the equal opportunities policies cover:
(check all boxes that apply)

- a. recruitment and selection of pupils?
- b. recruitment and selection of tenants?
- c. recruitment and selection of staff?
- d. fair allocation of work to members?
- e. making reasonable adjustments for disabled clients?
- f. making reasonable adjustments for disabled members/pupils?
- g. making reasonable adjustments for disabled staff?
- h. harassment?
- i. complaints and grievances from pupils regarding discrimination and harassment?
- j. complaints and grievances from members regarding discrimination and harassment?
- k. complaints and grievances from staff regarding discrimination and harassment?

- 3.7 Do the policies set out both formal and informal routes for raising grievances and complaints?
Yes: No:
- 3.8 How many complaints has Chambers received in the last two years related to equality and diversity?
- 3.9 Does Chambers have a written parental leave policy for members as recommended by the Bar Council's guidance?
(if so please provide a copy).
Yes: No:
- 3.10 If no, please provide an explanation why there is no policy in place.
- 3.11 Does the policy allow for six months (or more) maternity leave from Chambers free from rent and other expenses?
Yes: No:
- 3.12 Does Chambers have a written parental leave policy for staff?
(if so please provide a copy).
Yes: No:
- 3.13 If no, please provide an explanation why there is no policy in place.
- 3.14 Has Chambers appointed an Equal Opportunities Officer?
Yes: No:
- 3.15 Who is the Equal Opportunities Officer?

Communication

- 3.16 How are the equal opportunities and parental policies made available to members, staff and pupils?

Implementation

3.17 Does Chambers have arrangements for part time, flexible working and career breaks for:
(check all boxes that apply)

a. staff?

b. members?

3.18 Please provide details of these arrangements.

3.19 In the last 5 years, how many members have:

a. taken maternity leave?

b. returned to Chambers following maternity leave and established a practice for at least one year?

3.20 Do Chambers offer to make reasonable adjustments for disabled members, staff or clients?

Yes:

No:

3.21 If yes, is this referred to in Chambers' brochures?

Yes:

No:

3.22 Please provide examples of reasonable adjustments made in the last 5 years.

Recruitment

3.23 Are Chambers members of OLPAS?

Yes:

No:

3.24 Are standard forms used for:
(check all boxes that apply)

a. pupillage selection?

b. tenancy section?

- 3.25 In the recruitment process are:
(check all boxes that apply)
- | | for
Pupils | for
Members | for
Staff |
|-------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| a. there clear and objective selection criteria in place? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. selection committees used for recruitment decisions? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. standard scoring mechanisms used for the interviews?
(if so please provide an example template) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. all documents related to recruitment exercises retained for two years? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

3.26 If any of boxes for a-d are un-ticked, please provide an explanation of why Chambers do not comply with this requirement.

Monitoring and Corrective Action

3.27 Is diversity data collected in the recruitment process on:
(check all boxes that apply)

Pupillage

- a. race?
- b. gender?
- c. age?
- d. disability?

Tenancy

- e. race?
- f. gender?
- g. age?
- h. disability?

Staff Recruitment

- i. race?
- j. gender?
- k. age?
- l. disability?

3.28 Please specify any other diversity strands on which data is collected.

3.29 *Is this data monitored and analysed?*

Yes:

No:

3.30 *As a result of this monitoring, what action is taken to encourage applications from groups under-represented in Chambers?*

3.31 *If no action is taken please explain why*

Awareness

3.32 *Does Chambers provide information on developments in equality and diversity legislation or policy to:*
(check all boxes that apply)

a. *staff?*

b. *members?*

c. *pupils?*

d. *pupil supervisors?*

3.33 *How is that information provided?*

3.34 *Have externally provided diversity training courses been taken by:*
(check all boxes that apply)

a. *staff?*

b. *members?*

c. *pupils?*

d. *pupil supervisors?*

3.35 *Topics covered by diversity training:*
(check all boxes that apply)

a. *recruitment?*

b. *implementing the Equality and Diversity Code for Chambers?*

c. *reasonable adjustments?*

d. *disability awareness?*

e. *applying the age guidelines?*

3.36 *How many, in each of the categories below, have received diversity training in the last two years?*

a. *Staff?*

b. *Members?*

c. *Pupils?*

d. *Pupil supervisors?*

3.37 *If no diversity training taken, please explain why*

Completion

Thank you for completing the questionnaire. Before submitting, please ensure that the Head of Chambers has signed off the completed questionnaire.

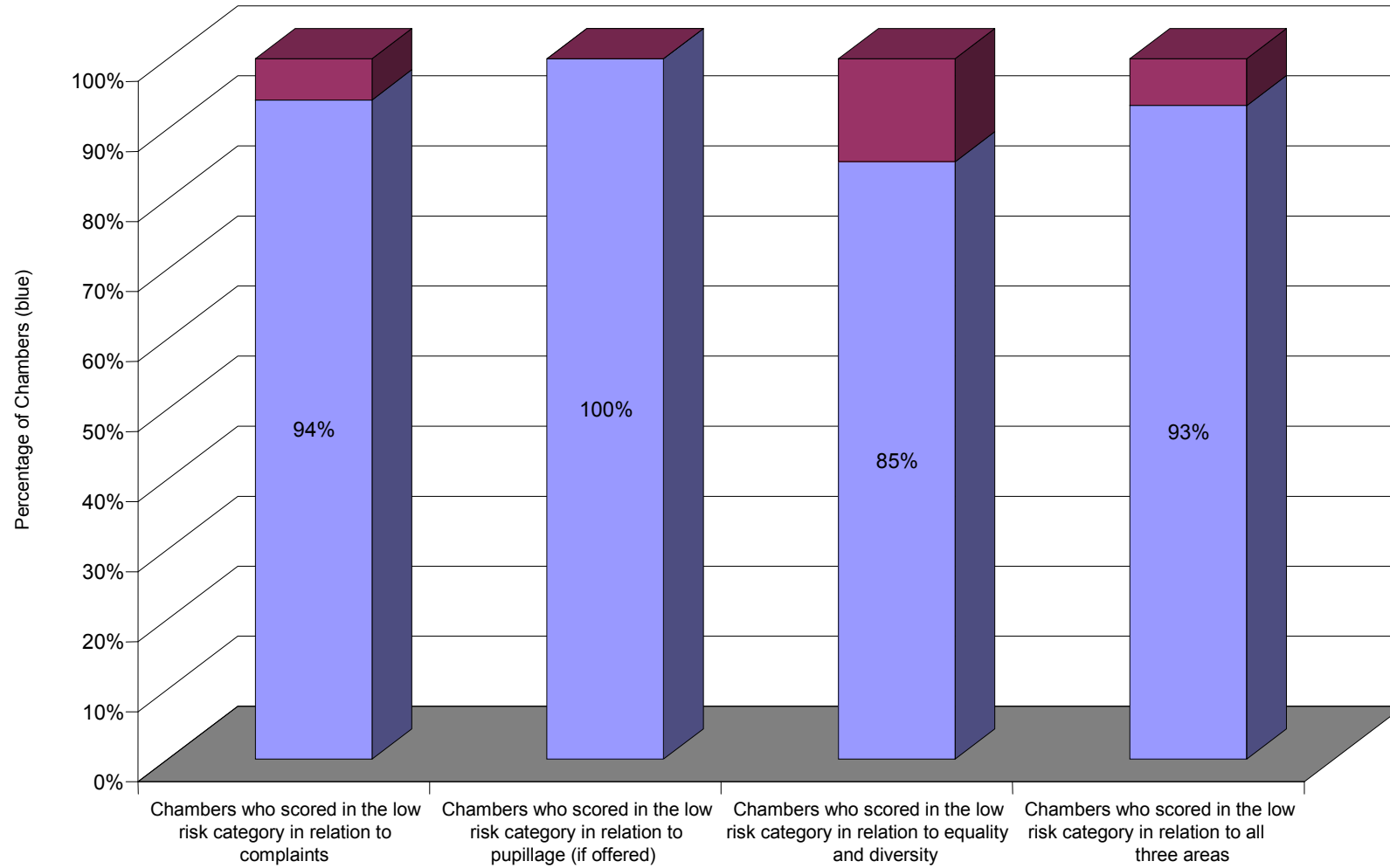
Please fill in the box below and, if you have completed the questionnaire manually, return it with any attachments to:

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

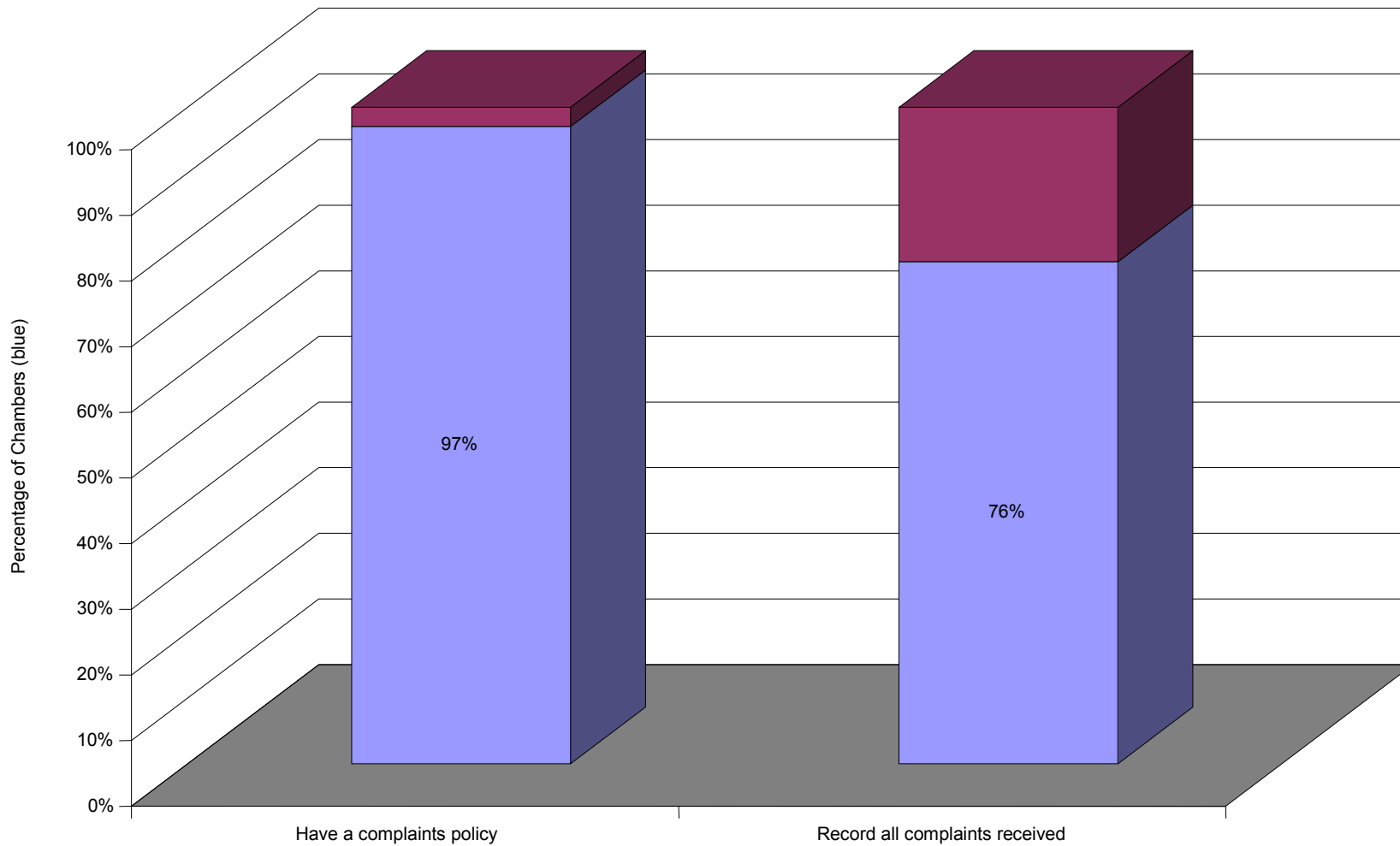
Questionnaire completed by:	
Position in Chambers:	
Contact telephone number:	
Email address:	
Confirm here that the questionnaire has been signed off by Head of Chambers	

Analysis of Chambers Compliance

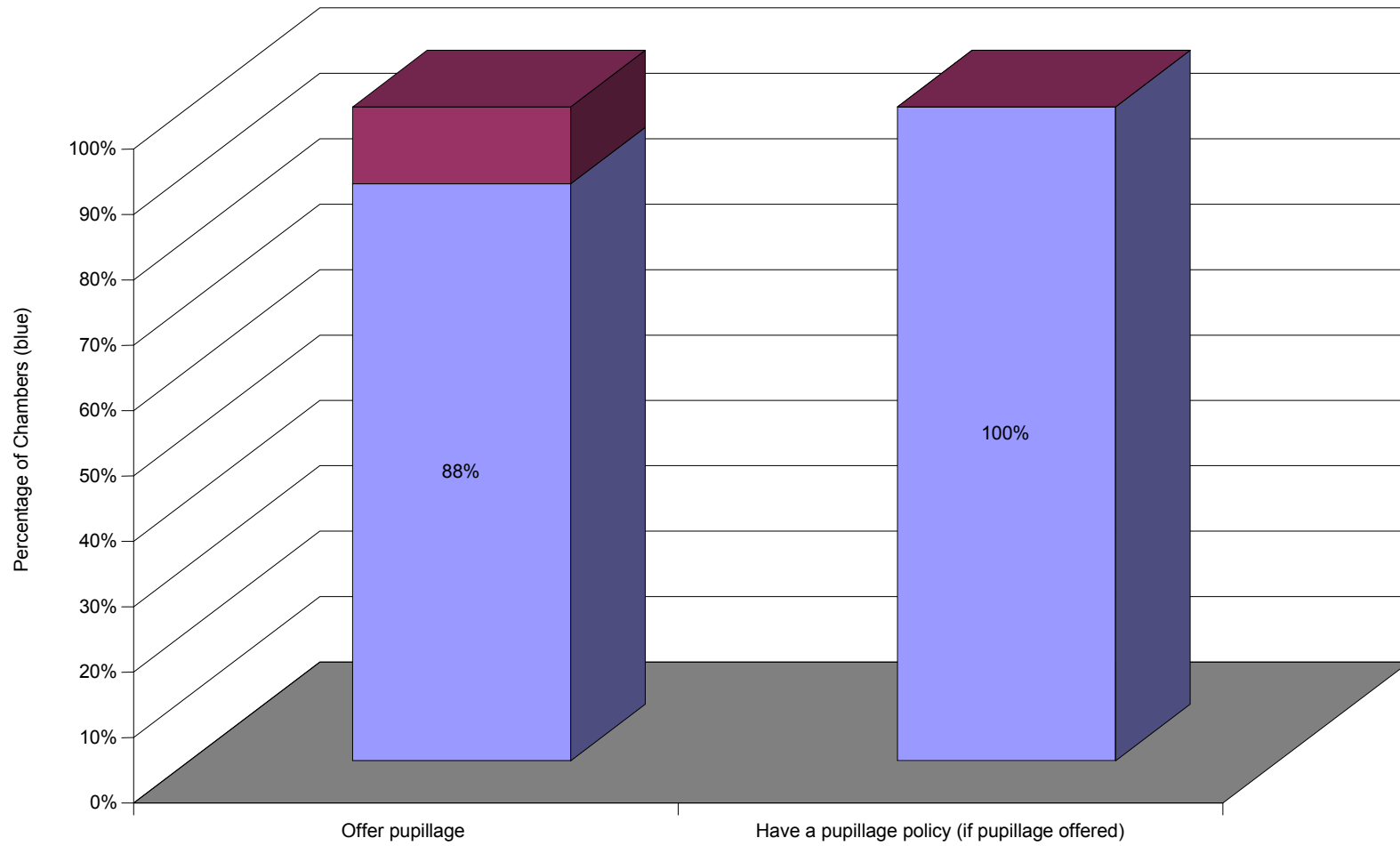
1. Overall summary of low risk ratings.



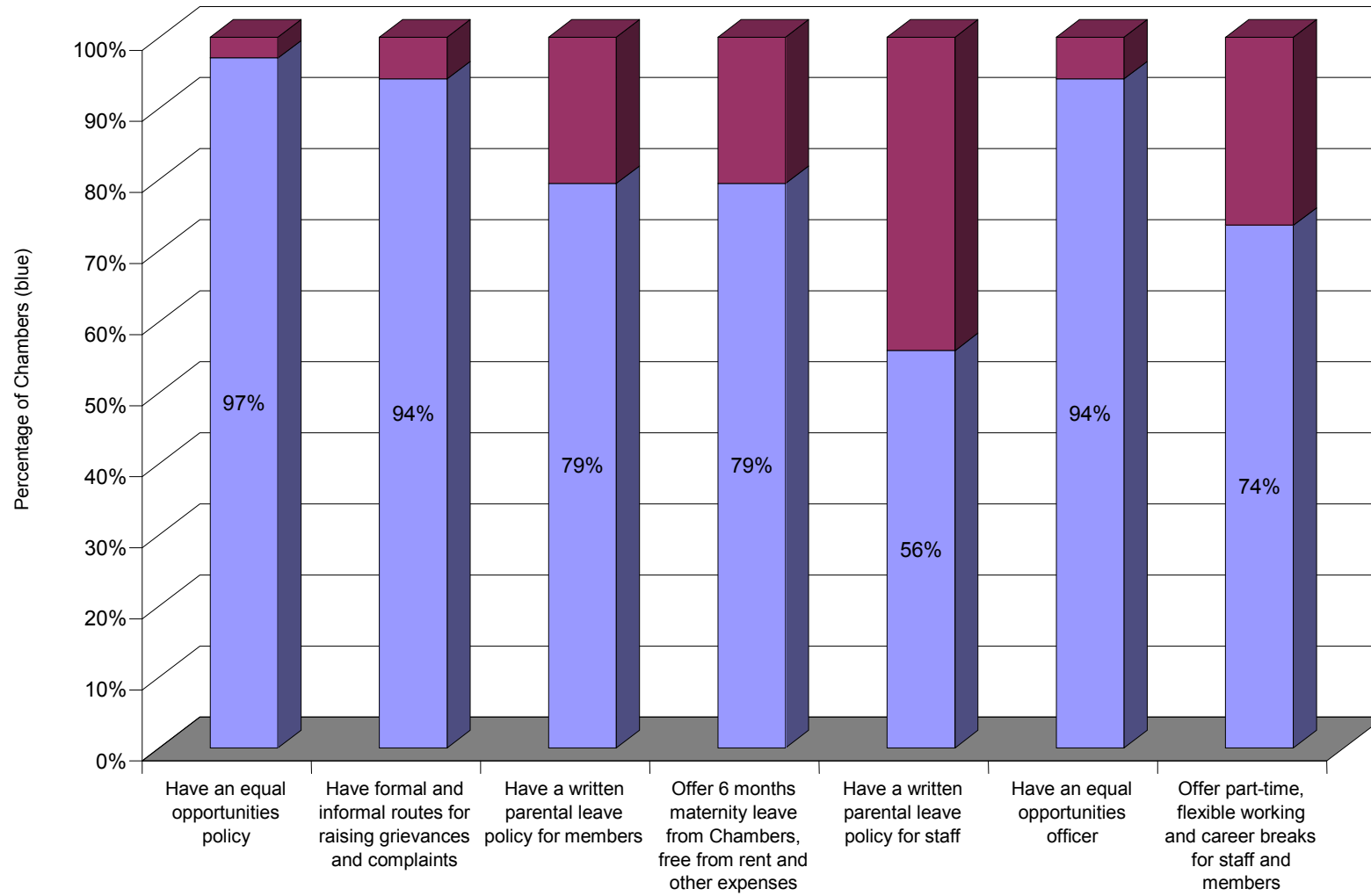
2. Complaints



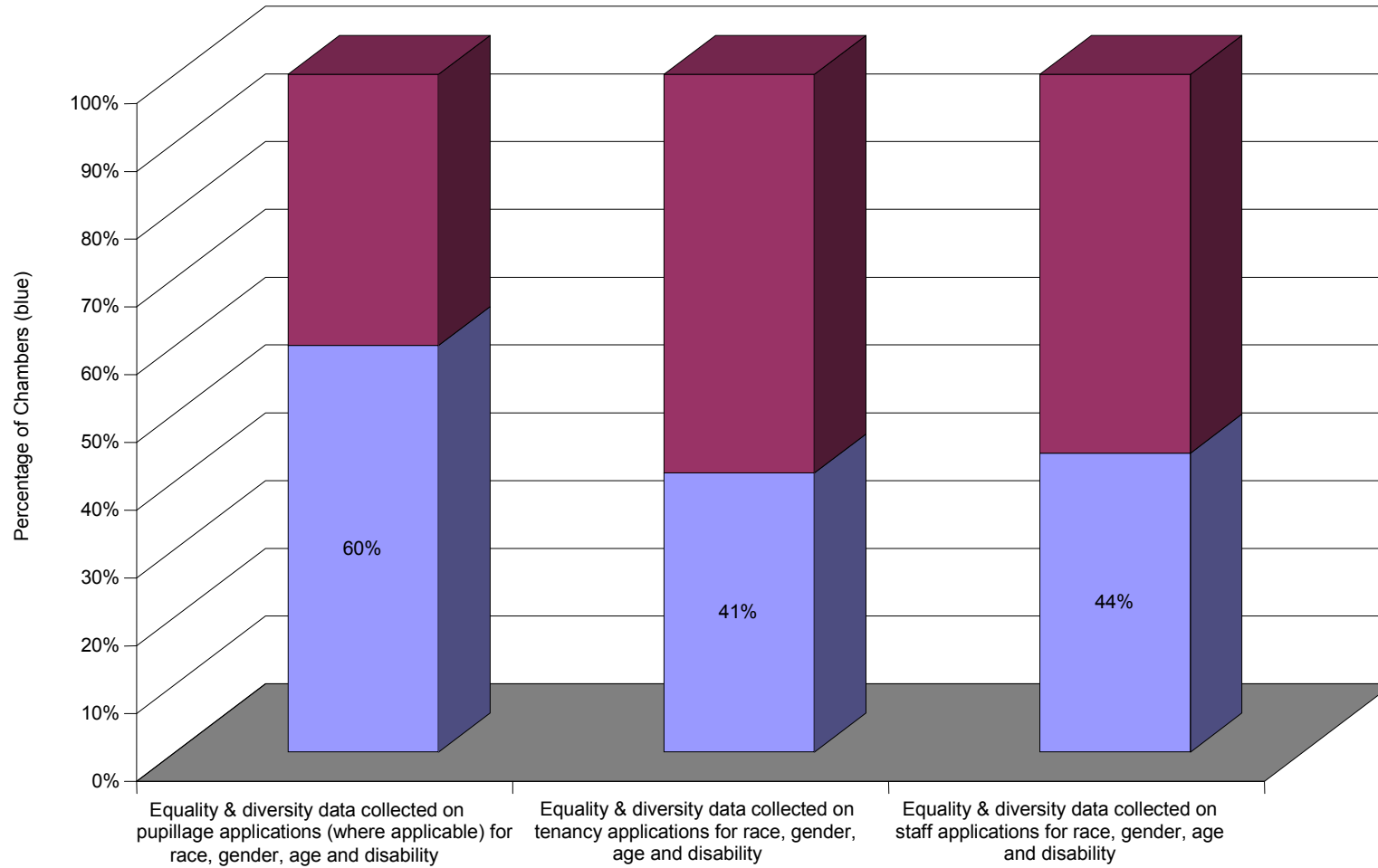
3. Pupillage



4. Equality and Diversity (General)



5. Equality and Diversity (Data Collection)



Chambers Monitoring Report




Date of visit: October 2008

Chambers Status
Partial Compliance

Contents

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5. Observations and Identified areas of Good Practice	7

Distribution List:	
	Head of Chambers





Key to risk:	
High	
Medium	
Low	

Restrictions of use

The matters raised in this report are only those which came to our attention during the course of our audit and are not necessarily a comprehensive statement of all the strengths and weaknesses that exist or all improvements that might be made. The report has been prepared solely for the management of the organisation and should not be quoted in whole or in part without our prior written consent. BDO Stoy Hayward LLP neither owes nor accepts any duty to any third party whether in contract or in tort and shall not be liable, in respect of any loss, damage or expense which is caused by their reliance on this report.

Executive Summary

Overall conclusion (based on questionnaire and visit)	
Compliance	Chambers is not currently compliant with the requirements in relation to equality and diversity and complaints handling.

Chambers Risk Assessment	
Complaints	
Pupillage	
Equality and Diversity	
Overall	

Areas for Improvement
Key Recommendations
Chambers should review the Equality and Diversity policy with a view to including all requirements of the Equality and Diversity Code.
Chambers should review their Complaints Policy and practices in view of current BSB guidance and update as necessary.

Overview

Following the return of the Chambers monitoring questionnaire and supporting documentation, a risk assessment was undertaken for Chambers.

An important element of any monitoring scheme is the ability to verify the information provided. The results of the assessment highlighted concerns with equality and diversity and Chambers complaints handling, therefore a visit to Chambers was arranged to explore these issues further.

The visit was conducted by Stuart May from BDO Stoy Hayward LLP (BDO). The BSB has retained BDO to assist with the pilot scheme. Oliver Hanmer, Head of Standards and Quality at the BSB, also attended the visit.

The visit involved:

- a discussion of the questionnaire with the Head of Chambers;
- a review of the complaints process and policy; and
- a discussion around the requirements for policies covering equality and diversity.

This report sets out the results of our visit and, where necessary, sets out our recommendations for how Chambers might improve their administration to ensure compliance with the Code requirements.

We have also identified areas of good practice where we have been particularly impressed with the procedures adopted by Chambers.

Background information on Chambers

1. Full name and address:

--

2. Head of Chambers

--

3. Number of Tenants

--

4. Areas of Specialism

--





5. Number of years in operation





--





Questionnaire Risk Assessment

Based on the monitoring questionnaire and supporting documentation returned by Chambers, a risk assessment was undertaken using a scoring system which rated the response to individual questions under each of the three areas under review.

Based on the scoring of the questionnaire and a scoring model outlined below a rating for each area has been determined.

Complaints	
Score:	Rating: 
<i>Scoring Model used in risk assessment:</i>	
High: 15 - 20	
Medium: 8 - 14	
Low: 0 - 7	

Pupillage	
Score:	Rating: 
<i>Scoring Model used in risk assessment:</i>	
High: 61 – 90	
Medium: 31 - 60	
Low: 0 - 30	

Equality and Diversity	
Score:	Rating: 
<i>Scoring Model used in risk assessment:</i>	
High: 83 - 108	
Medium: 43 - 82	
Low: 0 - 42	

Detailed Recommendations

This section sets out our recommendations for how Chambers might improve their administration to ensure better compliance with the Code requirements.

Ref.	Finding	Recommendation	Chambers Action
Equality and Diversity			
1.	Contrary to the requirements laid down in the Equality and Diversity Code, the current equality and diversity policy does not set out Chambers policies for parental leave and flexible working.	Chambers should review the Equality and Diversity policy with a view to including all requirements of the Equality and Diversity Code.	To provide an updated Equality and Diversity Policy to the BSB within 21 days of receipt of this report.

Detailed Recommendations

Ref.	Finding	Recommendation	Chambers Action
Complaints			
2.	The current complaints procedure does not reflect the latest guidance available from the Bar Standards Board.	Chambers should review their Complaints Policy and practices in view of this guidance and update as necessary.	To provide an updated Chambers Complaints Policy to the BSB within 21 days of receipt of this report.

Observations and identified good practice

This section sets out any additional observations from our visit not covered elsewhere in this report. It also highlights identified areas of good practice where we have been particularly impressed with the procedures adopted by Chambers.

Good practice - complaints

- Chambers has a pro-forma template form for the recording of complaints which provides a clear trail of action taken.

Good practice - pupillage

- Chambers has a competency framework in place to provide pupils with a clear guide as to what is required if they are going to succeed in obtaining tenancy in Chambers. This is made available at the start of pupillage.
- A structured programme of pupil assessment is in place.

Appendix I – Tenants and Staff Interviewed

Name	Position
	Head of Chambers

The Bar Standards Board and BDO Stoy Hayward LLP appreciate the time provided by all the individuals involved in this review and would like to thank them for their assistance and co-operation.

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