



The Costs Lawyer Standards Board's Regulatory Standards report 2015/16

May 2016

Background

Who we are and what we do

1. The Legal Services Board (LSB) is responsible for overseeing legal services regulators in England and Wales. We are independent of Government and of the legal profession. We hold to account regulators for the different branches of the legal profession. We drive change in pursuit of a modern and effective legal services market: one that better meets the needs of consumers, citizens and practitioners.

Regulatory standards

2. We have a process in place to hold the regulators to account for their performance. We consider the legal services regulators' performance against five regulatory standards: outcomes-focused regulation, risk assessment, supervision, enforcement and capability and capacity.
3. Effective delivery of the regulatory standards should lead to higher standards of professional conduct and competence amongst lawyers. It should help to create a legal services market with increased consumer choice and consumer confidence. It should encourage innovative practitioners who, if posing fewer risks, are not subject to intrusive or inflexible regulation. It will introduce a level of consistency in the approach to the regulation of legal services.
4. This is our second full assessment of the Costs Lawyer Standards Board's (CLSB) performance against the regulatory standards. To undertake this assessment we asked the CLSB to complete a self-assessment against the five regulatory standards. We also considered other evidence such as the results of a questionnaire aimed at understanding the experiences of individual users of the CLSB, the outcomes of in-depth interviews with, and written responses from, key stakeholder organisations and information gained in other areas of our work, such as statutory decisions and thematic reviews.
5. This report sets out our view on the performance of the CLSB against each regulatory standard as well as the grades we allocated to it. It should be read in conjunction with our thematic report on the performance of all of the regulators against the regulatory standards.¹ At Annex A we have provided some facts and figures about the CLSB.
6. Individual reports have been produced for each of the eight regulators. Care should be taken, if reading the other reports, to ensure misleading comparisons are not made, particularly in relation to the grades given. There are differences in: the size of the regulators, in terms of staff numbers, budget, and the regulated communities; the risk profiles; who they regulate (individuals, entities and

¹ The thematic report can be found here: http://www.legalservicesboard.org.uk/Projects/developing_regulatory_standards/index.htm

alternative business structures (ABS)); and the types of consumers their regulated communities engage with. We have taken the context of the CLSB into account when considering its performance against the regulatory standards. The grades available are listed below.

- Good – all indicators embedded appropriately in the organisation and inform day to day working practices.
- Satisfactory – significant progress is being made to embed indicators and use them in day to day working practices.
- Undertaking improvement and work is well underway – indicators have been introduced but are not yet embedded appropriately in the organisation and do not yet inform day to day working practices.
- Needs improvement and work has started recently.
- Recognise this needs to be done but work has not yet started.

The next steps

7. The report indicates the areas where we think that there is scope for improvement. We will agree with the CLSB a specific action plan as the basis for our future monitoring of performance. We aim to publish the action plan by the end of June 2016.
8. We would like to thank all those who contributed time, energy and insights to this regulatory standards review.

Overall assessment

9. Since 2012/13 the CLSB has maintained its core regulatory activities including taking enforcement action, and has not imposed any additional regulatory burden and cost on its regulated community. This has been welcomed by the regulated community. However, it still needs to make progress towards being a regulator which is risk and evidence-based, outcomes-focused and which takes account of consumer needs. In our 2012/13 report, and in our later 2015 Update report, we noted that the CLSB needed to develop an understanding of the needs of consumers of costs lawyers' services; a proactive approach to supervision; and a sophisticated evidence-based approach to risk assessment.² These actions still need to happen and we expect them to be done.
10. We consider that the development of a consumer focus by the CLSB would be assisted if it reconsidered one of its primary objectives: "To protect the status and interests of Costs Lawyers". This objective is set down in the CLSB's *Business Plan 2016* and its application is evident in the CLSB's risk register and in discussions with us on policy issues. In those discussions its overriding focus is 'what does the policy issue mean for the regulated community' rather than for the wider public interest. The CLSB's view that one of its primary objectives is to protect the status and interests of costs lawyers seems to us to be problematic with respect to its role as a regulator. The CLSB needs to consider whether that objective is consistent with the regulatory objectives under the Legal Services Act 2007 (the Act), in particular, the protection and promotion of consumers. No other legal services regulator has such an objective. It also indicates that the CLSB has not acted on another expectation set out in the 2015 Update report: that it improve its understanding of its regulatory role. The CLSB should review its objectives to ensure that they are appropriately focused on its role and on promoting the regulatory objectives under section 28 of the Act.
11. The CLSB does not agree that further work is needed on its risk or supervisory functions, although it has agreed to pilot a new method of collecting information on consumer needs. It considers that it provides proportionate regulation which is aligned with the risk the regulated community poses. This represents a major difference of view between the CLSB and the LSB. We have not seen sufficient evidence that the CLSB's regulated community is low risk. We therefore continue to consider that it needs to carry out further work to establish if this is the case. We have highlighted a number of areas within this report where further work should be carried out. We will monitor the CLSB's progress on these matters. By

² This is a reference to the following reports: *Developing Regulatory Standards: an assessment of the legal services regulators* report (December 2012) and our *Regulatory Standards 2014/15: an update report on the performance of the legal services regulators* (February 2015). Hereafter referred to as 2012/13 Regulatory Standards report and the 2015 Update Report. These reports can be found here: http://www.legalservicesboard.org.uk/Projects/developing_regulatory_standards/index.htm

the next time we undertake a similar review we expect progress to have been made, otherwise we may have to consider more formal action.

Grades

12. We set out below the grades that the CLSB awarded itself in 2012/13 and 2015/16 and those awarded by the LSB. As highlighted in this report there is a fundamental difference of view between ourselves and the CLSB about the quality of the CLSB's performance. The CLSB considers that its performance is 'good' but our view is different. The CLSB should consider carefully what is needed in order to be assessed as 'good' under our framework. In this report we have set that out and it is essential for CLSB to consider these matters from our perspective. We consider that the CLSB has made insufficient progress since 2012/13 and therefore have awarded it the same grades as we did in our initial report (other than in enforcement). We have highlighted in the report the key areas where progress is needed.

| Grade | Recognise this needs to be done but work has not yet started | Needs improvement and work has recently started | Undertaking improvement and work is well underway | Satisfactory | Good |
|-----------------------------|--|---|---|--------------|------|
| Outcomes-focused regulation | LSB 2015/16 | | | | |
| | CLSB 2015/16 | | | | |
| | LSB 2012/13 | | | | |
| | CLSB 2012/13 | | | | |
| Risk assessment | LSB 2015/16 | | | | |
| | CLSB 2015/16 | | | | |
| | LSB 2012/13 | | | | |
| | CLSB 2012/13 | | | | |
| Supervision | LSB 2015/16 | | | | |
| | CLSB 2015/16 | | | | |
| | LSB 2012/13 | | | | |
| | CLSB 2012/13 | | | | |
| Enforcement | LSB 2015/16 | | | | |
| | CLSB 2015/16 | | | | |
| | LSB 2012/13 | | | | |
| | CLSB 2012/13 | | | | |
| Capability and capacity | LSB 2015/16 | | | | |
| | CLSB 2015/16 | | | | |
| | LSB 2012/13 | | | | |
| | CLSB 2012/13 | | | | |

Assessment against the regulatory standards

Outcomes-focused regulation

To deliver this regulatory standard, we consider that regulators must:

- have high quality, up-to-date and reliable evidence on what legal services consumers need and how they use the services
- have effective engagement with consumers
- demonstrate that outcomes are being achieved
- review and update their arrangements based on the evidence they gather.

13. In our 2012/13 and again in our 2015 Regulatory Standards reports we highlighted our view that the CLSB did not hold high quality, up-to-date and reliable evidence on the needs of consumers of costs lawyer services and noted our expectation that improvement was needed in this area. Limited progress has been made, aside from the introduction of a consumer engagement strategy (which is not publicly available) and a client feedback survey on its website. The consumer engagement strategy sets out three objectives which are to engage with consumers and stakeholders to: understand the needs and requirements of consumers of costs lawyer services; provide information to help consumers understand and make decisions about costs lawyers; and consult with consumers and other stakeholders on policy matters. These objectives are sensible. However, we are concerned with how the CLSB intends to achieve these objectives. There is no mention in the strategy of how it will establish who the consumers are or how it will develop relationships with them. We are unclear as to how this strategy will enable the CLSB to start to build a relevant evidence base.
14. The CLSB has also told us that whilst it has a consumer strategy it is not an area where there has been or will be a significant investment. It argues that the majority of consumers of costs lawyers' services are informed professionals. We noted in our 2015 Update report that one third of costs lawyers receive some instructions from lay clients (with around 20 receiving 90% or more of their instructions from lay clients). Further, this suggests that the CLSB should consider a wider view of consumers including considering those who may be contemplating becoming a consumer. This would then be in alignment with section 8(4) of the Act which states that the needs of existing and potential consumers should be considered.
15. The CLSB also argues that it is unable to identify easily who consumers are, due to client confidentiality, and that it would require the costs lawyer to seek permission from their client for the CLSB to contact them. The CLSB considers that this would be a regulatory burden on its community from which it is not clear that there would be measurable benefit. We consider that understanding the

needs of consumers is a key tool for a well performing regulator as it enables risks to be identified and provides an evidence base for future policy development. We are therefore pleased to have agreed with the CLSB that it will pilot a client feedback questionnaire for 12 months. This will be distributed directly by costs lawyers to clients with the completed form being returned to the CLSB. We are also pleased that the CLSB is participating in the joint regulators' forum projects which are aimed at improving understanding of consumer needs and consumer engagement.

16. An area where the CLSB has progressed since our 2012/13 report is engaging with the regulated community to assist it in understanding the CLSB's approach to regulation. Activities it has undertaken include attendance at and addressing an annual national conferences and contribution of articles to the *Costs Lawyer Journal*. From the stakeholder feedback we have received directly, and from surveys we and the CLSB have run, the regulated community has said that the CLSB is providing the right level of regulation at the right cost. The CLSB's ethos of not imposing regulatory burden unless absolutely necessary is clearly appreciated by the regulated community.
17. During the reporting period (between October 2014 and October 2015), the CLSB has not made any rule change applications and we are not aware that it has reviewed and updated its regulatory arrangements. Whilst this may be understandable given the short timeframe involved, key stakeholders have expressed some concerns about the extent of the engagement they have had with the CLSB on reviewing education and training requirements so that those arrangements can become outcomes-focused. Such changes are being taken forward by a number of other legal sector regulators. Regulators should always evaluate their rules in alignment with best regulatory practice.
18. The final aspect of outcomes-focused regulation is that the regulator must demonstrate that its regulation is delivering the outcomes consumers expect. In our 2015 Update report we asked that all regulators collect evidence to understand the impact of the rules they impose and whether those rules are delivering the outcomes consumers expect. We note that little evidence has been collected. The number of complaints has been monitored but only after it restarted in 2015 (collection of the data was stopped in 2013/14). Whilst we recognise that it can be difficult to gather evidence on outcomes we would encourage the CLSB to consider creatively how it could monitor its impact.

Risk assessment

To deliver this regulatory standard, we consider the legal services regulator must:

- have formal, structured, transparent, evidence-based approaches to the collection, identification and mitigation of current and future risks which inform all regulatory processes
- focus their risk analysis on vulnerable consumers and consumer detriment
- have processes in place which are understood by the Board and staff
- demonstrate that outcomes are being achieved.

19. The CLSB continues to have an approach to corporate risk which means it is capable of responding to risks as they emerge. For example, following the Legal Services Consumer Panel's (LSCP) report on [Recognising and responding to consumer vulnerability \(October 2014\)](#) it has issued guidance to its regulated community on vulnerable consumers and placed an article in the *Costs Lawyer Journal*.³ It has also issued guidance on client care letters. While these are examples of responding to risk, we note that the vulnerable consumers' document does not offer much guidance to costs lawyers on matters that they should consider when dealing with such consumers or approaches that they could take when providing services. Further, the client care letter guidance could provide more granular examples of the information that should be provided to clients on how to complain. There is good practice that would assist the CLSB, for example, reviewing the LSCP's report, the Bar Standard Board's model complaints procedures and the Institute of Chartered Accountants in England and Wales' approach to client care letters. Its work on the joint regulators' forum project, which is considering the approach taken to client care letters more generally across the legal profession, should also be beneficial to the CLSB.
20. We raised concerns in our 2012/13 and 2015 Regulatory Standards reports about whether the CLSB is using the information it holds appropriately, as well as whether it is collecting the right information to facilitate analysis of future risks. To date we have seen no evidence of the CLSB changing its approach to risk management. We now expect the CLSB to take action in this area.
21. The CLSB says that its regulated community is low risk. It has based this analysis on a number of factors: the low level of service complaints and professional conduct complaints, the high level of compliance with the continuous professional development scheme, the consumer being predominantly an informed professional, and the fact that costs lawyers do not handle client monies. It says that this indicates that its "steady and proportionate" approach to risk assessment and regulation generally is appropriate. These are all relevant factors to take

³ Legal Services Consumer Panel report on Recognising and responding to consumer vulnerability (October 2014) at http://www.legalservicesconsumerpanel.org.uk/publications/research_and_reports/documents/Guide%20to%20consumer%20vulnerability%202014%20final.pdf

account of in a risk assessment but, as we said in our 2015 Update report, we consider that the CLSB should widen its evidence base for making such assessments in particular in relation to consumer needs.

22. The CLSB has widened its evidence base to a limited extent (restarting the collection of data from costs lawyers on first tier complaints) which is encouraging. However, it has not begun to develop a good understanding about the needs of consumers, nor has it considered what further evidence it could collect either from other organisations or costs lawyers. We are concerned that it has indicated that it does not consider its current approach to auditing costs lawyers' continuous professional development (CPD) files to be potentially "worthy of the time and cost involved" as failure to comply with the scheme is low risk to the consumer. Although we note that it has not indicated that such a practice will cease, and whilst we can understand why it may be attractive to suspend an activity which is not perceived to be adding value, to further limit the information that it can use for its risk assessments would be of concern.
23. The CLSB has not progressed sufficiently against the priority area we set it in 2015 which was to develop a more proactive approach to risk identification and mitigation by collecting more evidence about consumers and those regulated. We expect the CLSB to fully consider what evidence it could collect and from whom. It may be that the CLSB could benefit from liaising with other regulators and the representative body (the Association of Cost Lawyers) when undertaking this task.
24. The CLSB Board reviews the risk register at each Board meeting indicating that there is a good understanding of the importance of managing risk within the organisation. However, we have reviewed the CLSB's single risk register (it merged its three risk registers – consumers, business and the profession - in April 2015) and have concerns about its adequacy. Our concerns include:
 - it records matters which in our view are not risks
 - mitigations are very general and as noted in our 2012/13 report describe functional aspects of the CLSB's day to day business activity
 - risks included relate to the regulated community rather than to the regulator (which links to another concern we have noted at paragraph 10). It is not always clear how the risks relating to the regulated community impact on the CLSB.
25. In its current format the risk register does not seem to inform adequately the CLSB's decision-making or regulatory processes nor support the CLSB in managing and responding to risk effectively. The development of tools to ensure that a consistent evidence-based assessment of risk informs all regulatory processes was a priority area we set for all regulators in our 2015 Update report. We expect the CLSB to review its risk register in light of the concerns that we have highlighted.

Supervision

To deliver this regulatory standard, we consider the legal services regulator must:

- have a supervision policy that is carried out with reference to identified risks, all available information and is underpinned by an evidence-based understanding of the different market segments
- have access to a range of supervisory tools and willingness and capacity to use them
- have processes in place to enable learning to be shared and performance to be monitored.

26. The CLSB considers that it has a proactive, proportionate, risk and evidence-based approach to supervision which is monitored and overseen by its Board (such oversight is in line with our expectation of all regulators as set down in the 2015 Update report). It argues that the low risk presented by the regulated community means that its approach of reviewing practising certificate fee applications (which includes various declarations and proof of professional indemnity insurance), a requirement for costs lawyers to provide their complaint handling procedures and random audits of CPD records, alongside its annual audits of the education provider, is sufficient to supervise the profession. We disagree. As we said in our 2012/13 report monitoring the above factors are not an adequate replacement for a fit for purpose supervision policy. The CLSB could review other regulators' approaches to supervision to see if there are approaches it can adopt or adapt in a proportionate manner.
27. We also noted in our 2012/13 report that we understood the CLSB's desire not to overburden its regulated community with too high a level of intervention without a good cause. However, without an adequate evidence base on which it can undertake risk assessment, we do not consider that it is in a position to categorically state that any further supervisory intervention is unnecessary.
28. The CLSB has not, contrary to our expectation, developed and published an evidence-based supervision policy that incorporates the use of a wider range of supervisory tools as necessary. We expect that the CLSB will demonstrate improvement in this area, and if this is not achieved, we will consider what further action we should take.

Enforcement

To deliver this regulatory standard, we consider the legal services regulator must:

- have a range of effective and proportionate enforcement tools
- have published policies and guidance that enables others to understand the regulator's criteria for deciding to take action
- operate the enforcement function in a timely, evidence-based, fair and proportionate manner
- have appeal processes that are independent from the body or persons who made the original decision
- have processes in place to ensure that learning is shared and performance is monitored.

29. The CLSB performs well against the enforcement standard. The CLSB has a clear set of enforcement arrangements in place that allow for proportionate action to be taken within the timeframes out in the CLSB's Disciplinary Rules and Procedures. The CLSB uses the civil standard of proof at both the initial investigation and adjudication stage of the enforcement process which we consider is in line with best practice. The enforcement arrangements have been tested with complaints initiated by a third party and by the CLSB. These arrangements have proved to be effective.

30. The CLSB has also tested its arrangements when it initiated an investigation into a potential offence of 'pretend to be entitled' under Section 17 of the Act. Following consideration of the risks involved and the need to protect consumers, the individual was authorised by the CLSB with conditions on their practising certificate. The CLSB's register has been annotated to show the individual has conditions on their practising certificate; a new section of the website has been created - 'practising certificates with conditions'; and the Board minutes record that this case was discussed at a special meeting of the Board on 14 September 2015. The transparent approach to this issue is welcomed.

31. In our [Regulatory sanctions and appeals processes report – an assessment of the current arrangements \(March 2014\)](#) we said that it would be preferable for the enforcement appeals process to be independent from those who made the original decision.⁴ The CLSB has a separate appeals committee. Although the administration for any appeals committee is undertaken by CLSB (which creates the risk that this may reduce the appearance of independence) given the size of the regulator and the number of enforcement cases, we would not suggest this arrangement should be changed in the absence of any evidence that this is problematic.

⁴ LSB report on Regulatory sanctions and appeals processes - an assessment of the current arrangements. (March 2014)
http://www.legalservicesboard.org.uk/projects/thematic_review/pdf/20140306_LSB_Assessment_Of_Current_Arrangements_For_Sanctions_And_Appeals.pdf

32. While the CLSB is transparent and clear about its regulatory arrangements, we consider that there are three areas (which are outlined below) where this could be improved and which would also help address the two priority areas we set all regulators in our 2015 Update report in relation to improving transparency and accessibility of the enforcement process.

- The CLSB does not have decision-making guidance available for its Conduct Committee. This type of guidance is commonplace in regulation. Such guidance assists decision-makers to make decisions which are proportionate and consistent. It also enables the complainant and regulated community to understand how a decision is made.
- The CLSB publishes findings and outcomes of those cases concluded by the Conduct Committee only on a discretionary basis (rule 14 of the Disciplinary Rules and Procedures). Our expectation is that the findings and outcomes of cases should be published, and the professional should be named if a finding is made against him or her, unless it involves matters relating to the health of individuals. We consider that it is best regulatory practice and we point to the other regulators both within and outside of the legal sector that do this as a matter of routine.
- The CLSB has published a policy on *Expectations of a complainant and Internal Complaint Handling*. The policy aims to set out what is required of the complainant in terms of the enforcement process and then defines behaviours that are not acceptable to the CLSB. It would be consumer friendly to separate these two issues into two policy documents. In its current form there is a risk that it could discourage complaints.

33. From reviewing the CLSB's Board minutes, there is scrutiny of the performance of the enforcement process by the Board.

Capability and capacity

To deliver this regulatory standard, we consider the legal services regulator must:

- have clear and consistent leadership that ensures the whole organisation has a strong consumer focus
- have regulatory budgets and staffing set at appropriate levels for the risks associated with the market
- have a culture of transparency and improvement
- have management and governance processes in place which are capable of scrutinising the performance of the regulator.

34. The CLSB is the smallest of the regulators overseen by the LSB. It employs one full time member of executive staff and buys in external support on a 'needs' basis. It has maintained the cost of the practising certificate fee at £250 for five years; it says it has achieved this through stable and sound financial management and by being a proportionate regulator. Maintaining the cost of regulation at this level is notable. However, given our concerns about the need to obtain evidence around the risks associated with the market and the lack of progress it has made in certain areas, we cannot be certain that it has set the regulatory budget and staffing at the appropriate level.

35. As noted earlier in this report, one key area where we consider that little progress has been made since our 2012/13 report is the development of a consumer-focus. It is apparent from our discussions with the CLSB that it considers that as the majority of consumers of costs lawyers' services are informed professionals, there is less need for a strong consumer-focus. Whilst we agree that informed professionals are not as vulnerable as lay consumers, it is the role of a regulator to ensure that it understands the needs of all consumers, including potential consumers, so that it can protect and promote their interests.

36. Alongside the concerns we have about the CLSB's consumer-focus, which are mentioned throughout this report, we also have reservations about whether it has a strong enough culture of transparency and improvement. In terms of transparency (which was a priority area we asked all regulators to focus on in our 2015 Update report), the CLSB does publish its business plans, accounts and Board minutes, which is welcome. However, it does not consider it appropriate to publish its Board papers routinely, although it will consider requests under the Freedom of Information Act 2000. The CLSB is concerned that publication of papers may limit the extent to which matters can be candidly discussed. This is the same rationale it used when we asked if it could make its Board minutes more detailed so that the reader could understand not only the decision taken but how and why that decision was taken. We understand this view. However, it must be balanced against the need for legal services regulatory boards to show that they are working in the public interest and in accordance with their statutory duty

to have regard to transparency. Only where there are real issues of confidentiality should decisions be taken outside of public scrutiny. Whilst we do not agree with the CLSB's stance, we are encouraged that it has agreed to review its approach to drafting Board minutes to see if it could make them more detailed.

37. In terms of having a culture of continuous improvement which embeds best regulatory practice from the legal and other regulatory sectors we have seen little evidence of a proactive stance to improvement. This is evident in the CLSB's business plans of 2015 and 2016 which describes its ongoing and statutory activities without any additional text about where it hopes to develop or what it wants to achieve in 2015 and 2016. It is also indicated in the speed shown to engaging with its key stakeholders on moving to an outcomes-focused qualification and continuous professional development scheme. Whilst we recognise the need for the CLSB to be proportionate, it also needs to recognise that changes will be required from time to time, and that regulation is not static.

38. We consider that the CLSB Board does have adequate processes to scrutinise and monitor the performance of the regulator. This was a priority area we asked all the regulators to focus on in our 2015 Update report. There are regular Board meetings and within the self-assessment we received feedback from Board members that they consider they receive sufficient information to understand the performance of the regulator. The Board considered in July 2015 whether it needed to set and publish key performance indicators to help it with monitoring the performance of the executive but it decided that given the size of the CLSB and the amount of activity it undertakes, this would not be proportionate. This approach seems sensible.

Annex A

What is the Costs Lawyers Standards Board?

Key facts

- At 1 April 2015, a total of 598 cost lawyers were regulated by the CLSB. This is an increase since 1 April 2014 when 563 costs lawyers were regulated.⁵
 - For the year end 31 December 2016, the CLSB's regulatory budget totalled £151,500 (total anticipated expenditure). This is up 1.6% from £149,100 in the equivalent period in 2015.⁶
 - At 31 March 2015, the CLSB employed one full time equivalent member of staff.⁷
1. The Costs Lawyers Standards Board (CLSB) is the independent regulator for costs lawyers. The Association of Cost Lawyers (ACL) is the approved regulator according to the Legal Services Act 2007.
 2. The CLSB regulates costs lawyers with a practising certificate for working in England and Wales. The costs lawyer code of conduct issued by the CLSB sets out the professional standards expected of regulated costs lawyers and the CLSB takes action where necessary in order to keep standards high.⁸
 3. Its regulatory work for the costs lawyer profession includes setting and maintaining standards, this is achieved by:
 - setting and overseeing education and training requirements that need to be met to qualify as a costs lawyer
 - setting and overseeing the continuing professional development required of CLSB authorised and regulated costs lawyers
 - setting the professional standard expected of CLSB authorised and regulated costs lawyers by way of a code of conduct and practising rules
 - implementing disciplinary mechanisms for any CLSB authorised and regulated costs lawyer who might fall short of the professional standards expected of them.
 4. The CLSB Board consists of five non-executive members; three lay persons (including a lay chair) and two non-lay persons. It convenes every quarter to consider strategy and policy matters for the CLSB. It also convenes additional meetings on a 'needs be' basis.

⁵ Information provided in response to a data request issued by the LSB.

⁶ Information obtained from the CLSB's practising fees application:

http://www.legalservicesboard.org.uk/Projects/statutory_decision_making/section_51_practising_fees.htm#feeapplications

⁷ Information provided in response to a data request issued by the LSB.

⁸ Information obtained from the CLSB's website: <http://www.legalchoices.org.uk/legal-choices/types-of-lawyers/costs-lawyers/>