

Application made by the Bar Standards Board to the Legal Services Board under Part 3 of Schedule 4 to the Legal Services Act 2007 for the approval of changes to the Bar Standards Board's regulatory arrangements relating to barristers supervising immigration advisers.

Section 1 – Executive Summary

1. Barristers are entitled to supervise an immigration adviser, in accordance with Section 84(2)(e) of the Immigration and Asylum Act 1999 ('the Act'). This enables a legislative loophole to be exploited and we are concerned that this is creating unacceptable levels of risks for consumers, particularly those who are vulnerable. The loophole enables advisers who have been subject to certain serious sanctions by the Office of the Immigration Services Commissioner (the OISC), an approved regulator under the Legal Services Act 2007, or a professional body designated under Section 86 of the Act to continue to provide immigration legal services under the supervision of a barrister.
2. Our current regime does not explicitly restrict these arrangements, as we only have guidance for barristers entering into these supervision arrangements. This makes it difficult to take enforcement action, because guidance is not mandatory.
3. This application therefore seeks approval of a proposed a new rule to close this loophole so our regime can properly protect and promote the interests of consumers and maintain the trust and confidence which the public places in the profession, the legal system and the Bar Standards Board (BSB) as a regulator.

Section 2 – Background and details of current position

4. Section 84(2)(e) of the Act enables barristers to supervise unregulated immigration advisers.
5. The Act provides that no person may provide immigration advice and services unless they are a qualified person. A qualified person includes a person authorised to provide immigration advice and services by a designated qualifying regulator. The Bar Council is a designated qualifying regulator for the purposes of the Act and so a practising barrister is authorised as a qualified person. The legislation goes on to set out that a person is also a qualified person if they are acting on behalf of, and under the supervision of, a qualified person, whether or not they are under a contract of employment.
6. Due to the requirement that the adviser be supervised by the barrister, we consider that there is a direct link between the lay client and the barrister, irrespective of whether the service is being provided by the barrister or by a supervised person.
7. We currently have guidance which reminds barristers to ensure they exercise due diligence and check whether an adviser they propose to supervise has been prohibited or is currently suspended by the OISC. However, it is not explicit that we consider certain sanctions should prevent a barrister from exercising such a supervisory role due to the unacceptable risk to consumers. In any event, we believe that such a prohibition should be a rule, in order to ensure we can take adequate enforcement action. Because guidance is not mandatory, it is insufficient for our enforcement team to take any necessary action.

8. We are concerned that barristers may be supervising immigration advisers who have been subject to serious sanctions by another regulator and that this presents an unacceptable risk to clients. The sanctions include those who have been struck off, disbarred or otherwise prohibited from practising by the oversight organisation, whether permanently or temporarily. Such sanctions are only imposed for the most serious misconduct. For example, the Home Office made us aware of an arrangement whereby a former barrister, who was disbarred following very serious criminal convictions, is now representing clients in the immigration tribunal under the supervision of a practising barrister. The absence of an explicit rule preventing this type of arrangement is hampering our ability to take effective regulatory action and our Legal and Enforcement Department believes that an explicit rule will be necessary in order to secure a finding of professional misconduct. We have undertaken targeted supervision work in this area but encounter the same problem in relation to the absence of an explicit rule. Given the potential vulnerabilities of immigration clients, and the support we have from the OISC, the Home Office and the overwhelming majority of those we have engaged with (as set out in section 8), we consider it essential that this rule is implemented to properly protect consumers.
9. Our Supervision Team is also concerned about the potential risks of barristers being exploited by organised crime groups to facilitate entry to the United Kingdom, as corrupt unregulated persons might use a barrister to gain respectability¹. These concerns were raised by the National Crime Agency and they have encouraged regulators to be aware of these risks and to mitigate them as far as possible. We believe this rule change is a proportionate way of doing so.

Section 3 - Nature and effect of the proposed changes

10. We propose that the following wording should be included within the BSB Handbook under the 'associations with others' rules². This will have the effect of prohibiting barristers from supervising immigration advisers who have been subject to the sanctions listed within the rule.

rC85A *You must not act as a supervisor of an immigration adviser for the purposes of section 84(2) of the Immigration and Asylum Act 1999 (as amended) (IAA 1999) where the Office of the Immigration Services Commissioner has refused or cancelled the adviser's registration, or where the adviser is:*

1. *disqualified in accordance with paragraph 4 of Schedule 6 to the IAA 1999; or*
2. *prohibited or suspended by the First-tier Tribunal (Immigration Services); or*
3. *permanently prohibited from practising by an approved regulator, or a designated professional body under the Immigration and Asylum Act 1999, pursuant to its powers as such, and removed from the relevant register; or*

¹ <https://www.transparency.org.uk/publications/at-your-service/>

² rC79 onwards in the BSB Handbook. An association means where:

(a) BSB authorised individuals are practising as a chambers; or

(b) BSB authorised persons are sharing premises and/or costs and/or using a common vehicle for obtaining or distributing work with any person other than a BSB regulated person, in a manner which does not require the association to be authorised as an entity under the Legal Services Act 2007

4. *currently suspended from practising by an approved regulator, or a designated professional body under the Immigration and Asylum Act 1999, pursuant to its powers as such.*

11. We have also developed a question to include during the annual Authorisation to Practise process (the process of applying for a practising certificate), which will ask whether the barrister is undertaking, or intends to undertake in the next 12 months, a supervision arrangement in accordance with the Act. If so, the barrister will be required to complete the relevant notification form and submit this to us. Our Supervision Team will then review the form and engage with the barrister to mitigate any concerns which are identified.
12. We have also updated our guidance for barristers undertaking this arrangement so that we provide more clarity about what appropriate supervision looks like and reminding barristers of their obligations under our Handbook. Following the introduction of the new rule, we will supervise any barristers who are undertaking this type of work to ensure they are aware of the rule and guidance and are practising in accordance with them. If not, and they do not adjust their activity, then we could seek to take enforcement action.

Section 4 – Rationale for changes

13. We need to take the necessary steps to ensure that the legislative loophole which is currently being exploited is closed and that we have the necessary mechanism (i.e. a rule) so that consumers and the public are adequately protected. For the reasons discussed above, we believe this can only be done by introducing a rule.
14. The rule protects consumers against advisers who have committed serious misconduct, thereby mitigating the risk of a client receiving an inadequate standard of work and service. This is essential because of the potential vulnerabilities of some clients receiving immigration legal services³. We can therefore protect consumers, the trust and confidence the public places in the barrister, the profession, and the wider legal and immigration system. Introducing the proposed rule would also provide us with a clear basis for enforcement action (if necessary) to protect the public and their confidence in us as a regulator. The rule is necessary because barristers are not bound by guidance alone.
15. By having a clearly defined list of sanctions against advisers, we ensure consistency between different regimes intended to protect consumers⁴. For example, we consider the risks posed by an adviser who has been prohibited from providing immigration services by the OISC to be very similar to those of a solicitor previously regulated by the Solicitor's Regulation Authority (SRA) who practised immigration law and has been struck off for significant client failings.

Section 5 - Statement in respect of the Regulatory Objectives

16. We have assessed our proposal against the Regulatory Objectives. We outline our findings below.

³ <https://www.barstandardsboard.org.uk/uploads/assets/cd3602ac-a0bb-4e35-bb591368f07c80f9/immigrationthematicreviewreportmay2016.pdf>

⁴ The OISC, approved regulators and designated professional bodies

Protecting and promoting the public interest and protecting and promoting the interests of consumers

17. The rule change will further reduce the potential for high risk immigration advisers to provide immigration legal services to consumers (as they cannot be supervised by an authorised person, namely a barrister). Upholding these standards can therefore protect the trust and confidence which consumers and the public place in the profession.

Promoting competition in the provision of services and improving access to justice

18. The proposed rule change could adversely impact competition in the provision of services and access to justice because we are restricting the number of people who could be eligible to be supervised by a barrister. However, our proposed rule change only goes as far as necessary, because we are only restricting the highest risk arrangements where advisers have been prevented from practising by other regulators. Barristers can continue to take advantage of the flexibility within the Act to robustly supervise immigration advisers, enabling those who are not authorised persons under the Act, and have been subject to no or less serious sanctions, to supply immigration legal services. The impact on competition and access to justice will be on a very small scale; we are only aware of two individuals that this would have impacted, although it should be noted that only one of these arrangements are ongoing and we are unable to stop this without a rule. We also consider that the risks to consumers outweigh the possible adverse impacts on a small number of arrangements.

Promoting and maintaining adherence to the professional principles

19. This proposed rule change will provide greater clarity to barristers around appropriate supervision arrangements by mitigating the potential for unsuitable immigration advisers to provide services (they are unsuitable because they have been subject to serious sanctions). We and the OISC are concerned that without a rule change, barristers may not sufficiently adhere to the professional principles of acting with integrity, maintaining proper standards of work and acting in the best interests of clients because guidance alone is not binding.

The other regulatory objectives

20. We expect that this proposed rule change will have a neutral impact upon the following regulatory objectives:
 - Supporting the constitutional principle of the rule of law;
 - Increasing public understanding of the citizen's legal rights and duties; and
 - Encouraging an independent, strong, diverse and effective legal profession.

Section 6 - Statement in respect of the Better Regulation Principles

21. Our 'Associations with others' rules (where this proposed rule change would be included), are set out in Part 2 - C5 of our [Handbook](#) and already have outcomes to

guide our decision-making about a barrister's administration of their practice⁵. However, as set out above, our evidence from our Supervision Team, the OISC and the Home Office suggests these are insufficient alone to adequately protect and promote the interests of consumers as we are aware of some cases where barristers are entering into high risk arrangements. As we do not approve or authorise the arrangements, we are unable to prevent them or impose conditions. We have therefore determined it is necessary to introduce distinct rules to ensure there is clarity within our regulation. This has been overwhelmingly supported by stakeholders including the SRA, the OISC and barristers practising immigration law.

Section 6.1 - Transparent

22. We have undertaken four weeks of targeted engagement. Subject to approval, we will issue comprehensive updated guidance so that our expectations are clear for barristers in how any arrangements should operate. We plan to publicise the rule change and guidance in the following ways:

- Social media posts;
- Regulatory Update (mailing article to the whole profession);
- Press release;
- Counsel article (industry magazine); and
- An update on our website.

Section 6.2 - Accountable

23. As the regulator for the Bar, we are accountable for any changes that are made. We believe that the proposed rule change will help to meet our regulatory objectives.

Section 6.3 - Proportionate

24. As set out above, we are concerned about a case in which a disbarred barrister, who presents a high risk to vulnerable individuals, is circumventing our regime by continuing to provide legal services under the supervision of another barrister. Our proposed rule change is intending to close the legislative loophole which facilitates this arrangement and exposes potentially vulnerable consumers to high risk immigration advisers. We are limited in our ability to prevent this within our current regime. Our changes only seek to restrict those who have been subject to serious sanctions and are therefore proportionate as they only go as far as necessary to mitigate the risks we are concerned about.

25. From our supervision activity and the responses to our rule change consultation, our current evidence suggests that a very small number of barristers will be affected by the proposed rule change because we anticipate that most supervised advisers have not been subject to one of the sanctions in the proposed rule. Given the nature of the work which barristers generally undertake, and from what our evidence suggests, there is unlikely to be a significant number of consumers affected by a proposed change, as we anticipate that majority of immigration legal services are provided by

⁵ oC24 Your practice is run competently in a way that achieves compliance with the Core Duties and your other obligations under this Handbook. Your employees, pupils and trainees understand, and do, what is required of them in order that you meet your obligations under this Handbook.

oC25 Clients are clear about the extent to which your services are regulated and by whom, and who is responsible for providing those services.

advisers who are regulated either by the OISC or the SRA. In any event, the barrister will be able to continue to do the work.

26. By prohibiting the supervision arrangements which we consider to be too high risk, we expect that barristers will be able to administer their practice more effectively. It is not expected that this rule will have a significant adverse impact on barristers' practices but we will monitor and evaluate this, as set out at paragraph 31 below.
27. We have engaged with the OISC, the SRA and the Chartered Institute of Legal Executives to ensure that our suggested changes are compatible with each regime. We are not aware of any conflicts which could impede the operation of this rule.

Section 6.4 - Consistent

28. Introducing these changes will ensure consistency between our regime and the other regulators of immigration services and will be consistent with our risk-based approach to regulation i.e. targeting the areas which present the highest risks to the most vulnerable consumers⁶.

Section 6.5 - Targeted at cases where action is needed

29. Despite already having clearly defined outcomes and targeted guidance for barristers supervising immigration advisers, we are aware of arrangements which pose a high risk to potentially vulnerable clients. We are therefore proposing a rule which targets this high risk, whilst continuing the flexibility enshrined within the Act.

Section 7 - Statement in relation to desired outcomes

30. The desired outcome of our proposed change is that consumers are protected against high risk, sanctioned, immigration advisers by prohibiting such advisers being supervised by a barrister.
31. As part of the Authorisation to Practise process mentioned above, our Supervision Team will check the notification form which the barrister completes to ensure the arrangements fully comply with our regulations and will engage with the barrister as appropriate to resolve any issues. For any arrangements which do not constitute a breach, but otherwise raise concerns, we have the relevant systems in place to ensure we can closely monitor and engage with the barrister to mitigate these concerns.

How we will monitor and evaluate the proposed rule

32. Set out below are the key actions we will take to monitor and evaluate the proposed rule:
 - We will keep an ongoing log of any queries we receive about the interpretation of the rule, so we can monitor whether this is understood by the profession.
 - When we review each notification form for compliance, we will keep an ongoing log of any issues so that we can either update our guidance (as necessary) or use this as evidence to review the effectiveness of the rule.

⁶ For example, see our [research](#) and [regulatory changes](#) in relation to Youth Court advocacy and our [Immigration Thematic Review](#)

- Continue to engage with the Home Office and the OISC to ensure we are notified of any non-compliance.
- We plan to review all of this information once the rule has been in place for two years to determine whether any changes are necessary.

Section 8 - Stakeholder engagement

33. We ran a four-week targeted consultation with the stakeholders listed below:

- Bar Council;
- Office of the Immigration Services Commissioner;
- The Solicitors Regulation Authority;
- The Chartered Institute of Legal Executives;
- Immigration Law Practitioners' Association;
- All barristers we are aware of who are supervising immigration advisers who are subject to an OISC sanction; and
- All barristers with Immigration listed as a practice area.

34. The consultation was also published on the BSB's website. A copy of the consultation document can be found at Annex A. A copy of the summary of responses can be found at Annex B. There was strong and significant support for our proposals from those who responded, including the SRA, CILEx and the OISC. The OISC also consider it essential in order to close a legislative loophole which can cause harm to consumers.

35. This change will only impact barristers who practise immigration law, of which there are just over 1,400 (out of approximately 16,000 practising barristers). This will therefore not impact on the majority of the practising Bar.

Section 9 - Statement in relation to impact on other Approved Regulators

36. We have engaged with the OISC and the regulators whose remit covers the provision of immigration services.

37. Our engagement with the OISC and the SRA took place prior to the issuing of the consultation to ensure the harmonisation of our respective regimes.

38. We have not publicly worked on changing our regulation in this area in the past. We will carefully monitor and evaluate the proposed changes, if approved, to manage any impacts appropriately, as set out at paragraph 31 above.

Section 10 - Implementation timetable

October 2019	Start of consultation on our new proposals
November 2019	Submit rule change application to the LSB
January 2020	LSB approval (if within 28 days of application)
January 2020	Implementation of the new immigration supervisors rule
February 2020	Authorisation to Practise begins

Section 11 - BSB contact for matters relating to this application

If the LSB has any queries in relation to this application, please contact:

Chelsee Howells

Senior Policy Officer

Bar Standards Board

289-293 High Holborn, London, WC1V 7HZ

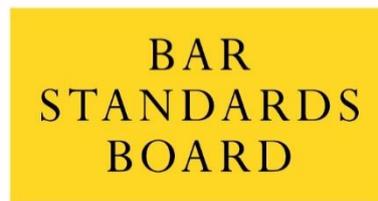
Telephone: 0207 6114 687

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Annex A – BSB consultation - Barristers supervising immigration advisers

Annex B – Summary of responses

Annex A – BSB consultation - Barristers supervising immigration advisers



REGULATING BARRISTERS

Barristers supervising immigration advisers

Rule change consultation

October 2019

1. This paper seeks your views on a possible rule change to the Bar Standards Board's (BSB) Handbook, which sets out the regulatory obligations on barristers.
2. The rule change would prohibit barristers from supervising immigration advisers who have received certain sanctions from the Office of the Immigration Services Commissioner (OISC – the regulator of immigration advice and services), an approved legal services regulator⁷, or a designated professional body⁸.

Background

3. Section 84(2)(e) of the Immigration and Asylum Act 1999 ('the Act') enables barristers to supervise unregulated immigration advisers. However, OISC have concerns that people who should not be giving immigration advice because they have been subject to the sanctions below could nonetheless be supervised by barristers under the legislation:
 - Cancelled or refused registration; or
 - Disqualified in accordance with paragraph 4 of Schedule 6 to the Immigration and Asylum Act 1999 (as amended) (IAA 1999); or
 - Prohibited or suspended by the First-tier Tribunal (Immigration Services).
4. The fact that advisers who are subject to the above sanctions are still able to provide immigration services to clients when supervised by a barrister has the unintended result of undermining OISC's regulatory regime. This could result in harm to immigration consumers, and potentially undermine the trust and confidence which the public places in barristers (and the wider legal and immigration system).
5. To ensure consistency and to prevent the regimes of approved legal regulators or designated professional bodies from being undermined, we propose to prohibit barristers from supervising an individual who has been subject to one of the sanctions listed in paragraph 3 above, or who has been struck off or disbarred or is currently suspended by their approved regulator or designated professional body.

Proposed rule

6. We propose that the following wording should be included within the BSB Handbook under the 'associations with others' rules⁹:

rC85A *You must not act as a supervisor of an immigration adviser for the purposes of section 84(2) of the Immigration and Asylum Act 1999 (as amended) (IAA 1999) where the Office of the Immigration Services Commissioner has refused or cancelled the adviser's registration, or where the adviser is:*

1. *disqualified in accordance with paragraph 4 of Schedule 6 to the IAA 1999; or*

⁷ Section 20 of the Legal Services Act 2007

⁸ Section 86 of Immigration & Asylum Act 1999

⁹ rC79 onwards in the BSB Handbook. An association means where:

(a) BSB authorised individuals are practising as a chambers; or

(b) BSB authorised persons are sharing premises and/or costs and/or using a common vehicle for obtaining or distributing work with any person other than a BSB regulated person, in a manner which does not require the association to be authorised as an entity under the Legal Services Act 2007

2. *prohibited or suspended by the First-tier Tribunal (Immigration Services); or*
3. *permanently prohibited from practising by an approved regulator, or a designated professional body under the Immigration and Asylum Act 1999, pursuant to its powers as such, and removed from the relevant register; or*
4. *currently suspended from practising by an approved regulator, or a designated professional body under the Immigration and Asylum Act 1999, pursuant to its powers as such.*

Question 1: Do you agree that we should prohibit barristers from supervising immigration advisers in the circumstances described above and with our proposed wording of the prohibition?

7. Barristers are already required to notify us if they are currently supervising an immigration adviser under our 'associations with others' rules. We intend to formalise this process by requiring barristers to notify us during the annual Authorisation to Practise (AtP) process, and at any other time during the year (via MyBar, the online portal) if they are currently supervising an immigration adviser or intend to do so within the next 12 months. No further rules are necessary as this new process is adequately captured within our rules on 'associations with others'¹⁰ and issuing of practising certificates¹¹.

Other issues and proposals

8. We currently have [guidance](#) for barristers who are supervising immigration advisers which reminds them of their obligations under our Handbook. It also provides an overview of what we expect from supervisory arrangements. However, we propose to set out in more detail what we would expect good supervision to look like and how to comply with any new rules. This is likely to be via case studies and clearer guidelines on our expectations. Barristers will be signposted to this guidance in our Handbook¹².

Question 2: Do you have examples of good supervision arrangements which could be used to inform our guidance and case studies?

Let us know your thoughts

9. Please let us know what you think by Friday 8 November 2019 via one of the methods below:

Email: professionalstandards@barstandardsboard.org.uk

Telephone: 020 7611 1444

Address: Professional Standards Team

The Bar Standards Board

289-293 High Holborn

London

WC1V 7HZ

¹⁰ rC80 of the BSB Handbook

¹¹ rS48 and rS69

¹² This signposting guidance will be included below any new rules within the associations section.

Annex B – Summary of responses to the rule change consultation for barristers supervising immigration advisers



REGULATING BARRISTERS

Summary of responses to the rule change consultation for barristers supervising immigration advisers

November 2019

Introduction

1. During October and November 2019, the Bar Standards Board (BSB) launched a consultation which proposed a restriction on barristers supervising immigration advisers who have been subject to serious sanctions with the Office of the Immigration Services Commissioners (the OISC), an approved regulator under the Legal services Act 2007 or a professional body designated under the Immigration and Asylum Act 1999 ('the Act').
2. The consultation closed on 8 November 2019. We received a total of 24 responses to the consultation. Responses were received from the following:
 - The Office of the Immigration Services Commissioner (OISC)
 - The Bar Council
 - The Solicitors Regulation Authority (SRA)
 - The Chartered Institute of Legal Executives (CILEx)
 - 19 barristers
 - Immigration Law Practitioners' Association
3. This paper summarises the responses we received, the key issues raised and the BSB's response.

Question 1: Do you agree that we should prohibit barristers from supervising immigration advisers in the circumstances described above and with our proposed wording of the prohibition?

Full support of the proposals

4. The overwhelming majority of respondents agreed with our proposed rule, both in terms of the policy position (that certain sanctioned advisers should not be allowed to provide immigration services under the supervision of a barrister) and the wording of the rule itself. This full support was received from the majority of the profession (76% of the barristers who responded), the Immigration Law Practitioners' Association, the Bar Council, the OISC and the SRA.
5. The support was provided on the grounds that immigration consumers are potentially vulnerable and high risk advisers should not be able to continue to provide immigration services under the supervision of a barrister.

'We agree, and strongly support, that the BSB should prohibit barristers from supervising immigration advisers in the circumstances described in the proposed rule rC85A. We cannot think of any circumstance in which it would be appropriate for a barrister to supervise an unregulated immigration advisor who has been subject to one of the sanctions listed in the consultation document or who has been struck off or disbarred or is currently suspended by their approved regulator or designated professional body. We also agree with the proposed wording of the prohibition'

Barrister

'I support the new proposed rule. Immigration clients are vulnerable and so should be protected to the maximum extent from unsuitable advisors. It undermines the idea of regulation if barristers can supervise those sanctioned'

Barrister

"As an immigration and asylum practitioner I am all too well aware of the vulnerability of clients in this field. I also agree with the basic principle that regulatory regimes should not undermine each other. On both grounds I support the proposed amendments'.

Barrister

6. Two respondents, whilst agreeing with our proposals, felt that the BSB should be informed of any sanctions from the relevant organisation and that these should be included on our website, so it is more efficient for barristers to check. In the absence of this, they suggested direct links be provided to where the barrister can find the information. One of these respondents also suggested that advisers should annually declare to the barrister whether they have been subject to any sanctions.

Partial support of the proposals

7. One respondent agreed with the principle of the proposed change but emphasised the need for barristers to undergo training before they are able to supervise immigration advisers, and for an authorisation process to be in place.
8. One respondent, whilst acknowledging that changes are needed in this area, suggested the proposed rule may be too restrictive, and that a sanctioned adviser could be supervised by a barrister to facilitate re-training. They suggested that supervision could take place during the final month of the sanction.

Opposition to the proposals

9. One respondent did not agree with our proposals. They felt that our regulation should either allow barristers to supervise any adviser, regardless of sanctions, or to prevent supervision entirely of unregulated advisers. They supported the supervision of sanctioned advisers because it provides better protection for the public as the barrister is overseeing the work. They also raised concerns that the issue is not widespread and therefore questioned the proportionality of the proposed rule.

BSB response

10. We welcome all of the responses we received and the overwhelming support for this rule change. We acknowledge the suggestions and concerns which have been raised and we have set out our response to these below.
11. As the Act permits barristers to supervise unregulated advisers, we consider an outright ban to undermine competition and access to justice. Our proposal is the least restrictive rule necessary to protect consumers against advisers who would not otherwise be able to provide immigration services due to their sanctions.

12. As any barrister wishing to supervise in accordance with the Act will need to notify the BSB and evidence their suitability to enter these arrangements, this will provide our Supervision Team with an opportunity to engage with the barrister if there are any concerns, such as their experience and having the systems to robustly supervise. This will also enable us to monitor the arrangements and determine whether specific training may be necessary.
13. We will publish updated guidance, setting our expectations of any arrangements, so that barristers are clear what is expected of them and that they are personally responsible for the work of the adviser.

Question 2: Do you have examples of good supervision arrangements which could be used to inform our guidance and case studies?

14. We had a limited number of responses to question two. For those who did respond, many did not feel they were able to comment.
15. Two respondents emphasised the importance of training for the barrister supervising the adviser to ensure they have the skills to do this properly. We also received a detailed response from one chambers, who provided the range of measures they have implemented to ensure their supervision arrangements of unregulated advisers is sufficient.

BSB response

16. The responses we received to this question have provided useful evidence to support our guidance and to develop examples of good practice.