



Investigation, Disciplinary
& Appeals Rules
Annual Report 2020

Introduction

Andrew Donovan, Enforcement Lead, CILEx Regulation Board

As the Portfolio Holder on CILEx Regulation’s Board for Enforcement, I am pleased to introduce this report on the work of the Enforcement Team, Professional Conduct Panel, Disciplinary Tribunal and Appeals Panel during 2020 and I hope you find it informative.

The CILEx Code of Conduct sets out principles to which CILEx members, CILEx Practitioners and CILEx regulated firms must adhere in their conduct, practice and professional performance and the outcomes they must meet. Membership and regulated practice carry both privileges and responsibilities. They require members of our regulated community to ensure that in their conduct, practice and professional performance, they develop and use their professional knowledge and skills for the benefit of those who use their services, maintain good professional relationships with others and act in a way that promotes confidence and trust in the legal professions and the provision of legal services.



We welcome reports from the public as it helps us to ensure that those we regulate are keeping to the standards we expect of them. We look at the information available and decide whether we can take any action. We focus our efforts on the most serious cases where there is a real risk to the public and consumers or the standards expected. We are also responsible for considering prior conduct declarations made by members of our regulated community, those applying to join it and for determining fitness to practise and fitness to own a business delivering legal services.

We have three independent decision-making bodies who also consider the conduct of those regulated by us, namely the:

- **Professional Conduct Panel**
- **Disciplinary Tribunal**
- **Appeals Panel**

This report reviews the activity of the Enforcement Team and the independent decision makers.

Can I take this opportunity to thank all the Enforcement team staff, our panellists and their independent Clerks for their hard work and dedication across the year. CILEx Regulation are indebted to them for their commitment and expertise and for their notable contribution to our effectiveness as a regulator.

Overall Developments and Updates

Like most businesses we moved our teams to home working in March 2020 as a result of the Covid-19 pandemic. Also, with the help of our panel and tribunal members we swiftly and successfully moved all panel meetings and tribunals onto remote platforms. The LSB agreed a temporary rule change to allow for remote panels/tribunals as the default position with a provision to allow each party to apply for an in person hearing if they could show a remote hearing would be unfair. All panel and tribunal hearings planned for 2020 went ahead remotely.

We successfully ran our first online panel training session in November 2020.

During 2020 we sought feedback using an online survey from panel and tribunal members as well as those whose case was heard by a panel or tribunal. Overall, the panellists felt that communications were good from CILEx Regulation and offered some additional elements to include in future panellists' induction and training sessions. The responses from individuals whose cases were heard were also very positive, including praise for individual investigation officers, with only the timeliness of dealing with a case being criticised by one respondent.

We have continued to use the You Said We Did exercise with the panels and this was reviewed and added to in November 2020.

We continue to report learning points arising from adverse findings in the CILEx Journal and to promote understanding of the Code of Conduct and the role of the enforcement function in in the CILEx Journal and on our website. In 2020 we wrote articles about competence and authorisation, prior conduct and the likely outcome of proven dishonesty and we updated our website giving consumers and members of the public clear guidance on how to report concerns about our members conduct to us as well as how to self-declare any relevant conduct.

We continue to identify improvement to the enforcement function and our Board have supported us developing risk-based enforcement once the risk based supervision is implemented.

We have improved and developed the CRM and one outcome of this is ensuring high levels of compliance with the regulatory requirement to declare prior conduct annually.

Our investigators completed an advanced level 7 course in investigative practice and advocated more cases in the tribunal in 2020 than ever before.

As a team we began work on lean processes and look forward to working together more to ensure all of our processes are as lean as possible when delivering the high standard of enforcement required.

Prior Conduct Declarations

Prior conduct declarations are made by members or potential members about conduct matters which may affect suitability to become or remain a member, such as a criminal conviction or county court judgment.

Of the 929 declarations received in 2020, 123 were either by a new applicant for membership (25) or an existing member declaring a new matter (98). Other declarations were members declaring prior conduct matters that had been previously declared to us.

	2020	2019	2018	2017	2016
Declarations received	929	526	696	595	164
Declarations Delegated	730	512	596	442	143
% Delegated	78.6%	96.4%	85.6%	74.3%	87.2%

Declarations dealt with by the Professional Conduct Panel (PCP)

In total, 37 prior conduct matters were heard by the Professional Conduct Panel, of which 32 were approved and 5 rejected.

Appeals Panel (AP)

There were no appeals against prior conduct decisions in 2020.

Timescales

As a result of most of the work undertaken during 2020 being conducted by staff working from home, the average length of time taken to dispose of prior conduct matters increased for both delegated decisions and the Professional Conduct Panel.

The average time for a delegated decision to be made rose from 4 weeks in January 2020 to 7 weeks in December 2020. For the PCP, the average time to dispose of prior conduct matters rose from 9 weeks in January 2020 to 21 weeks in December 2020.

To address the timescales and increasing caseload, an additional caseworker will be recruited on a two-year fixed term basis. In addition, improvements are planned to our database so that members can see what they have previously declared so that they do not need to duplicate declarations which will significantly reduce declaration numbers.

Misconduct, Complaints and Allegations

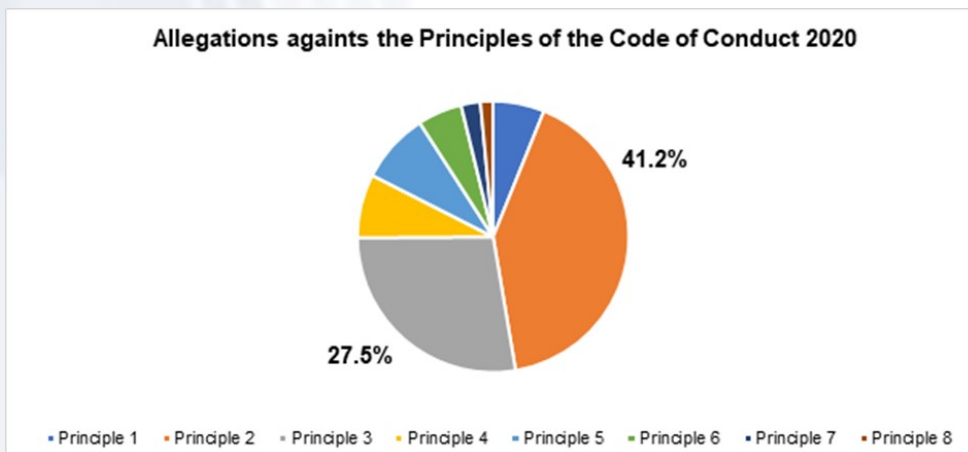
There were 65 complaints of misconduct open at the start of 2020 and a further 65 were received during the year. CPD non-compliance is now dealt with through Membership rather than as a misconduct matter as a proportionate way to address ongoing competency.

	2020	2019	2018	2017
Complaints open at start of year	65	52	43	154
Complaints relating to CPD non-compliance	0	0	3	121
Number of complaints received	65	66	68	42
Number of allegations within complaints	130	81	75	45
Number of complaints concerning Fellows	41	41	30	28

The 65 complaints received related to a total of 130 allegations. This is higher than in previous years and may reflect a willingness to deal with complaints against the full code of conduct. The increased complaint numbers received in 2018 and 2019 continued in 2020. The additional caseworker will help meet this caseload increase.

Allegations based on Principle 2 (Professional Standards) and Principle 3 (Honesty and Integrity) are consistently the most common and accounted for 69% of allegations in 2020 compared to 88% in 2019. It is noticeable that other principles are being utilised more frequently and this is viewed as a positive step to help ensure regulated members comply with principles in the Code of Conduct.

Breakdown of Allegations	2020	2019	2018	2017
Principle 1 - Uphold the rule of law and the impartial administration of	6.1%	2.5%	2.7%	1.5%
Principle 2 - Maintain high standards of professional and personal conduct and justify public trust in you, your profession and the provision of	41.2%	56.8%	58.7%	55.6%
Principle 3 - Behave with honesty and integrity	27.5%	30.9%	29.3%	28.9%
Principle 4 - Comply with your legal and regulatory obligations and deal with regulators and ombudsmen openly, promptly and co-operatively	7.6%	4.9%	4.0%	3.2%
Principle 5 - Act competently in the best interests of your client and respect client confidentiality	8.4%	3.7%	4.0%	3.2%
Principle 6 - Treat everyone fairly and without prejudice	5.3%	0.0%	1.3%	1.5%
Principle 7 - Ensure your independence in not compromised	2.3%	1.2%	0%	3.2%
Principle 8 - Act effectively and in accordance with proper governance and sound financial and risk management principles	1.5%	0%	0%	1.5%
Principle 9 - Protect client money and assets	0%	0%	0%	1.5%



Delegated decisions for misconduct cases

In 2020, there were 27 delegated decisions taken by officers, of which 24 related to members and 3 related to entities regulated by us. The complaint was rejected for 17 cases, 6 were dealt with by means of a Determination by Consent (DBC) and 4 complaints were sufficiently serious to be referred directly to the Disciplinary Tribunal (DT).

Delegated Decisions	2020	2019	2018	2017
Number of delegated decisions	27	24	6	5
- Determination by consent (DBC)	6	1	2	3
- Complaint rejected	17	22	4	1
- Referred directly to DT	4	1	0	1

Professional Conduct Panel (PCP)

During 2020, 10 cases were heard by the Professional Conduct Panel (PCP), of which 7 related to members in the highest grade (Fellow). All 6 of the DBCs were upheld and 4 instances where the complaint had been rejected, the officer's decision was upheld. A rejected complaint is only put before the PCP if the complainant appeals the officer's decision.

Professional Conduct Panel (PCP)	2020	2019	2018	2017
Number of misconduct cases considered	10	18	18	6
- Number relating to Fellows	7	10	11	2
Cases referred to DT	0	4	6	4
DBC approved	6	3	3	1
Decision to reject a complaint upheld	4	1	4	1
Reprimand / Warning / Undertaking	0	1	3	0
NFA / No case to answer	0	9	2	0

Disciplinary Tribunal (DT)

Of the 7 cases heard by the DT, 4 complaints had been made against Fellows and all 7 complaints were proven and resulted in exclusion from membership. There were 17 allegations relating to the 7 cases, of which 12 (70.6%) were under Principle 3 (Honesty and Integrity) and only one of the 7 cases did not include an allegation under this Principle.

Disciplinary Tribunal (DT)	2020	2019	2018	2017
Number of cases heard by the DT	7	7	5	12
- Number relating to Fellows	4	1	2	1
Exclusion	7	4	1	6
Warning / Reprimand	0	1	3	2
Withdrawn / NFA	0	2	1	2
Ordered to resign	0	0	0	1
Not proven	0	0	0	1

Appeals Panel (AP)

No appeals were heard during 2020. One decision by the DT of exclusion made in 2020 is currently being appealed.

Appeals Panel (AP)	2020
Number of appeals heard	0

Timescales

In January 2020, a set of timescale targets were introduced for dealing with misconduct complaints. These targets were applied only to complaints received from the beginning of 2020. Due to the length of time these targets were based on, only the target of achieving an initial assessment of complaints within 1 month produced data within 2020. The average for the year was 81% within 1 month against a target of 100%.

Reporting against the longer timescale targets will be made in the 2021 annual report.

The average number of weeks to both a delegated decision and a PCP outcome was 41 weeks for 2020. We saw a notable increase in the average time to reach an outcome via the Disciplinary Tribunal from 66 weeks in January to 102 weeks by December. This reflects the difficulties in moving to a virtual panel hearing for the Disciplinary Tribunal during lockdown, which we would anticipate will return to historic levels post-pandemic.

Learning and feedback from panellists

In 2018 the Enforcement Team introduced a ‘You Said, We Did’ feedback mechanism for our independent panellists to help ensure feedback was being heard. Panellists have appreciated this step to ensure panellist feedback is acted on. We have also introduced user survey feedback forms in 2020. Whilst numbers are low the feedback so far has been overwhelmingly positive. Most importantly, it demonstrates the Enforcement team’s commitment to accountability and learning.

As a further step forward for ensuring accountability and learning, Panellists were asked for any feedback they wished to highlight to the Board in this report at the first panellist training session in 2021. There were no significant matters raised. The clerks fed back that where the Enforcement Team had suggested that the clerks act as the primary contact with applicants/respondents/appellants, this new approach had helped panel effectiveness and trust of those subject to enforcement proceedings as to the fairness of the process. The clerk to the Appeals Panel suggested that the Rules for the Appeals Panel would benefit with being more detailed like the rules for the Disciplinary Tribunal. We will be taking this helpful recommendation forward when we next make a rule change.

Equality and Diversity

CILEx Regulation is committed to treating everyone fairly and equally regardless of their background, and to examining its processes to ensure that they reflect best practice in this respect. We recognise that to be effective and serve the public interest we need to ensure the practices, procedures and composition reflect and are relevant to the population we serve. Our new CRM is helping improve the level of diversity data capture.

Cilex Membership

Figures for the overall membership of CILEx are shown below.

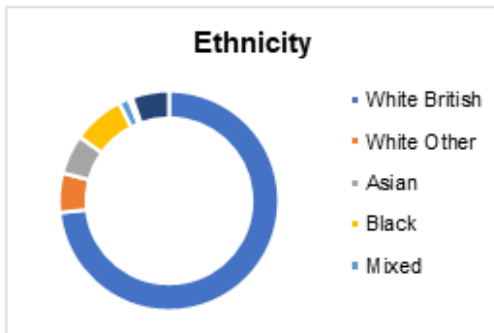
Ethnicity		Age	
White	84.4%	16-25	6.7%
Asian	7.0%		
Black	3.5%	26-35	30.4%
Mixed	2.3%	36-45	26.6%
Other	0.3%	46-55	20.2%
PNS / Unknown	2.4%	56-65	10.9%
		65+	3.2%
		PNS / Unknown	2.0%
Gender			
Female	76.9%		
Male	22.3%		
Other	0.05%		
PNS / Unknown	0.75%		

Prior Conduct

The tables below show the breakdown by ethnicity, gender and age for the 929 declarations of prior conduct.

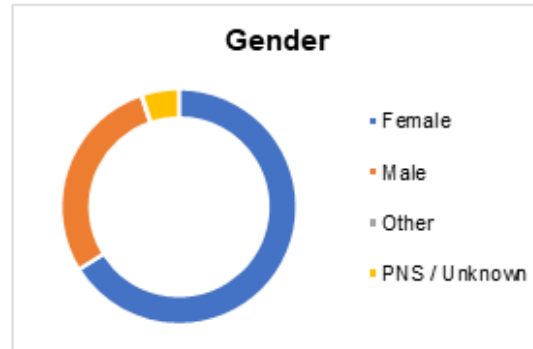
Ethnicity

White British	680	73.3%
White Other	54	5.8%
Asian	54	5.8%
Black	71	7.6%
Mixed	14	1.5%
Other	5	0.5%
PNS / Unknown	51	5.5%



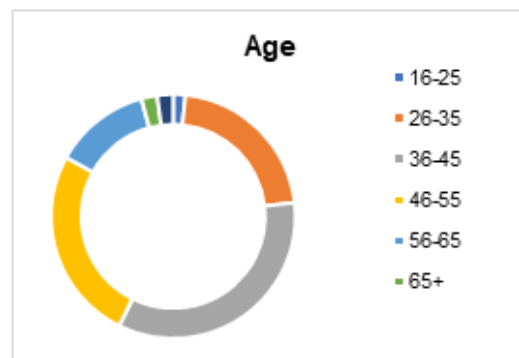
Gender

Female	614	66.1%
Male	267	28.7%
Other	1	0.1%
PNS / Unknown	47	5.1%



Age

16-25	15	1.6%
26-35	201	21.6%
36-45	317	34.1%
46-55	239	25.7%
56-65	119	12.8%
65+	19	2.1%
U/K	19	2.1%



The tables below show the breakdown by ethnicity, gender and age for the 32 declarations of prior conduct which were **approved by the PCP**.

Ethnicity			Gender	
White	19	59.4%	Female	16
Asian	7	21.9%	Male	14
Black	1	3.1%	PNS / Unknown	2
Other	0	0.0%		
PNS / Unknown	5	15.6%		

Age	
16-25	2
26-35	9
36-45	7
46-55	5
56-65	6
65+	1
PNS / Unknown	2

Ethnicity

- White
- Asian
- Black
- Other
- PNS / Unknown

The tables below show the breakdown by ethnicity, gender and age for the 5 declarations of prior conduct which were **rejected by the PCP**.

Ethnicity		Gender	
White	1	Female	1
Asian	1	Male	3
Black	1	PNS / Unknown	1
Other	1		
PNS / Unknown	1		

Age	
16-25	0
26-35	1
36-45	1
46-55	0
56-65	2
65+	0
PNS / Unknown	1

Misconduct

The tables below show the ethnicity, gender and age of members whose complaints of misconduct were dealt with by delegated decision.

Ethnicity <table border="1"> <tr> <td>White British</td> <td>14</td> <td>58.3%</td> </tr> <tr> <td>Asian</td> <td>3</td> <td>12.5%</td> </tr> <tr> <td>Mixed</td> <td>1</td> <td>4.2%</td> </tr> <tr> <td>Not recorded</td> <td>6</td> <td>25.0%</td> </tr> </table>			White British	14	58.3%	Asian	3	12.5%	Mixed	1	4.2%	Not recorded	6	25.0%	Gender <table border="1"> <tr> <td>Female</td> <td>14</td> </tr> <tr> <td>Male</td> <td>10</td> </tr> </table>		Female	14	Male	10
White British	14	58.3%																		
Asian	3	12.5%																		
Mixed	1	4.2%																		
Not recorded	6	25.0%																		
Female	14																			
Male	10																			
<p>Ethnicity</p> <ul style="list-style-type: none"> White British Asian Mixed PNS / Unknown 			Age <table border="1"> <tr> <td>16-25</td> <td>0</td> </tr> <tr> <td>26-35</td> <td>3</td> </tr> <tr> <td>36-45</td> <td>8</td> </tr> <tr> <td>46-55</td> <td>5</td> </tr> <tr> <td>56-65</td> <td>4</td> </tr> <tr> <td>65+</td> <td>2</td> </tr> <tr> <td>U/K</td> <td>2</td> </tr> </table>		16-25	0	26-35	3	36-45	8	46-55	5	56-65	4	65+	2	U/K	2		
16-25	0																			
26-35	3																			
36-45	8																			
46-55	5																			
56-65	4																			
65+	2																			
U/K	2																			

Outcomes of delegated decisions by ethnicity, gender and age

Ethnicity	White	Asian	Mixed	U/K
Complaint rejected	7	2	1	4
Determination by Consent	5	-	-	1
Refer to Disciplinary Tribunal	2	1	-	1

Gender	Male	Female	U/K
Complaint rejected	5	9	-
Determination by Consent	2	4	-
Refer to Disciplinary Tribunal	3	1	-

Age	16-25	26-35	36-45	46-55	56-65	65+	U/K
Complaint rejected	-	2	5	2	4	-	1
Determination by Consent	-	-	2	2	-	1	1
Refer to Disciplinary Tribunal	-	1	1	1	-	1	-

Ethnicity, gender and age of members whose matters were dealt with by the Professional Conduct Panel

Ethnicity		Age	
White	8	16-25	0
Not recorded	2	26-35	0
Gender		36-45	3
Female	5	46-55	3
Male	5	56-65	1
		65+	1
		Not recorded	2

Outcomes of Professional Conduct Panel decisions by ethnicity, gender and age

Outcome by Ethnicity	White	U/K	Outcome by Gender	Male	Female
Approval of DBC	5	1	Approval of DBC	2	4
Rejection Upheld	3	1	Rejection Upheld	3	1

Outcome by Age	16-25	26-35	36-45	46-55	56-65	65+	U/K
Approval of DBC	-	-	2	2	-	1	1
Rejection Upheld	-	-	1	1	1	-	1

Ethnicity, gender and age of members whose matters were dealt with by the Disciplinary Tribunal

Ethnicity			Gender	
White	2	28.6%	Female	2
Asian	1	14.3%	Male	5
PNS / Unknown	4	57.1%	Age	
<p>Ethnicity</p> <ul style="list-style-type: none"> White Asian PNS / Unknown 			16-25	0
			26-35	1
			36-45	3
			46-55	1
			56-65	1
			65+	0
			Not recorded	1

Outcomes of Disciplinary Tribunal decisions by ethnicity, gender and age

All cases heard by the Disciplinary Tribunal in 2020 resulted in the sanction of Exclusion.

Panellist Profile

Diversity data for the Professional Conduct Panel, Disciplinary Tribunal and Appeals panellists is shown below.

Professional Conduct Panel (PCP) = 7 members

<table border="1"> <thead> <tr> <th colspan="2">Ethnicity</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>3</td> </tr> <tr> <td>Not recorded</td> <td>4</td> </tr> </tbody> </table>		Ethnicity		White	3	Not recorded	4	<table border="1"> <thead> <tr> <th colspan="2">Age</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>-</td> </tr> <tr> <td>31-40</td> <td>-</td> </tr> <tr> <td>41-50</td> <td>-</td> </tr> <tr> <td>51-60</td> <td>2</td> </tr> <tr> <td>61-64</td> <td>-</td> </tr> <tr> <td>65+</td> <td>1</td> </tr> <tr> <td>Not recorded</td> <td>4</td> </tr> </tbody> </table>		Age		<30	-	31-40	-	41-50	-	51-60	2	61-64	-	65+	1	Not recorded	4
Ethnicity																									
White	3																								
Not recorded	4																								
Age																									
<30	-																								
31-40	-																								
41-50	-																								
51-60	2																								
61-64	-																								
65+	1																								
Not recorded	4																								
<table border="1"> <thead> <tr> <th colspan="2">Gender</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>2</td> </tr> <tr> <td>Male</td> <td>5</td> </tr> </tbody> </table>		Gender		Female	2	Male	5																		
Gender																									
Female	2																								
Male	5																								

Disciplinary Tribunal (DT) = 8 members

<table border="1"> <thead> <tr> <th colspan="2">Ethnicity</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>7</td> </tr> <tr> <td>Not recorded</td> <td>1</td> </tr> </tbody> </table>		Ethnicity		White	7	Not recorded	1	<table border="1"> <thead> <tr> <th colspan="2">Age</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>-</td> </tr> <tr> <td>31-40</td> <td>-</td> </tr> <tr> <td>41-50</td> <td>2</td> </tr> <tr> <td>51-60</td> <td>5</td> </tr> <tr> <td>61-64</td> <td>-</td> </tr> <tr> <td>65+</td> <td>-</td> </tr> <tr> <td>Not recorded</td> <td>1</td> </tr> </tbody> </table>		Age		<30	-	31-40	-	41-50	2	51-60	5	61-64	-	65+	-	Not recorded	1
Ethnicity																									
White	7																								
Not recorded	1																								
Age																									
<30	-																								
31-40	-																								
41-50	2																								
51-60	5																								
61-64	-																								
65+	-																								
Not recorded	1																								
<table border="1"> <thead> <tr> <th colspan="2">Gender</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>4</td> </tr> <tr> <td>Male</td> <td>4</td> </tr> </tbody> </table>		Gender		Female	4	Male	4																		
Gender																									
Female	4																								
Male	4																								

Appeals Panel (AP) = 6 members

<table border="1"> <thead> <tr> <th colspan="3">Ethnicity</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>3</td> <td>50.0%</td> </tr> <tr> <td>Black</td> <td>1</td> <td>16.7%</td> </tr> <tr> <td>Not recorded</td> <td>2</td> <td>33.3%</td> </tr> </tbody> </table>			Ethnicity			White	3	50.0%	Black	1	16.7%	Not recorded	2	33.3%	<table border="1"> <thead> <tr> <th colspan="2">Age</th> </tr> </thead> <tbody> <tr> <td><30</td> <td>-</td> </tr> <tr> <td>31-40</td> <td>-</td> </tr> <tr> <td>41-50</td> <td>2</td> </tr> <tr> <td>51-60</td> <td>5</td> </tr> <tr> <td>61-64</td> <td>-</td> </tr> <tr> <td>65+</td> <td>-</td> </tr> <tr> <td>Not recorded</td> <td>1</td> </tr> </tbody> </table>		Age		<30	-	31-40	-	41-50	2	51-60	5	61-64	-	65+	-	Not recorded	1
Ethnicity																																
White	3	50.0%																														
Black	1	16.7%																														
Not recorded	2	33.3%																														
Age																																
<30	-																															
31-40	-																															
41-50	2																															
51-60	5																															
61-64	-																															
65+	-																															
Not recorded	1																															
<table border="1"> <thead> <tr> <th colspan="2">Gender</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>3</td> </tr> <tr> <td>Male</td> <td>3</td> </tr> </tbody> </table>			Gender		Female	3	Male	3																								
Gender																																
Female	3																															
Male	3																															

Equality analysis

Numbers at the disciplinary end of the enforcement work are too small to draw firm conclusions from 2020's data. But the new CRM system is allowing us to capture and report on broader equality enforcement outcomes. This is the first report showing the equality data for all the prior conduct declarations for example.

Whilst the number of disciplinary cases CILEx Regulation deals within a year are not large enough to draw firm conclusions, equally the 2020 figures do not suggest any obvious detrimental ethnicity bias, in the context other regulators such as the SRA do report disproportionately higher levels of disciplinary action against ethnic minorities. Of all the 17 disciplinary cases referred to either the PCP or DT, only one member was from an ethnic minority (with the caveat that two members put PNS and the ethnicity for three was unknown).

An external equality expert's analysis of CILEx Regulation enforcement data did not find any ethnicity bias in 2018 or 2019 either, with the caveat that there were significant gaps in the data. The external consultant's main recommendation was to improve equality data capture which we have done through making it mandatory from the end of 2020 for all member to provide equality information (or state prefer not to say) as part of renewals on the new CRM database. This will allow us to start building comprehensive cumulative totals over the coming years to provide sufficient numbers for statistically significant analysis. This will offer the most telling insights into whether there are unexplained differential outcomes related to protected characteristics.

There is no obvious age bias in the data either.

The only area where there was a noticeable differential outcome related to gender where more men were subject to disciplinary actions in 2020 (appreciating numbers are very low and a cumulative total over future years will offer a more certain picture). Equally, this gender difference was also identified by the external equality expert's analysis of previous years data. More men being subject to disciplinary proceedings is in line with norms for other regulators and in the criminal justice system so this is expected, but it does give pause for thought. Equally, no one has raised concerns of experiencing gender bias in our enforcement proceedings.

We are committed to ensuring our processes are fair and free from overt or unconscious bias. This includes equality and diversity being a key strategic objective for CILEx Regulation, publishing our equality performance for transparency and accountability purposes, targeted training and induction for enforcement panel members and staff, using external neutral equality consultants to assess our enforcement processes, and improving the information and analysis of equality and diversity data in relation to the outcome of cases.

We also launched a user experience survey in 2020 to help us understand how we can improve respondents' and witnesses' experience of appearing at the Tribunal – especially vulnerable and disadvantaged groups. None of the user feedback so far has raised any concerns of bias or equality issues in our processes.

Conclusion

The data in this report does not identify any significant concerns to highlight. With the recruitment of an additional member of staff, we would expect to see timescales improve. In addition, we continue to improve data collection and analysis of complaints and allegations enabling us more effectively to draw out trends in the types of allegations and adverse findings being made and inform development of our risk-based approach.

As we develop our risk-based approach to enforcement to further improve delivery of our enforcement function, we look forward to consulting with our regulated members and stakeholders on our approach to investigating allegations of misconduct and to assessing suitability and fitness to practice and own.

