

Enforcement Annual Report 2021

Chair's Foreword | Helen Astle, Enforcement Lead, CILEx Regulation Board

Consumers rightly expect honesty, integrity, and high standards of conduct from regulated individuals and firms, and they are entitled to have trust and confidence in the legal profession and services they receive. Our Enforcement function is central to delivering that trust and we do this with the overriding aim of protecting and promoting the public and consumer interest, as well as the reputation of the profession.

The CILEX Code of Conduct (the Code) sets out nine principles to which all CILEX members (and applicants for membership), practitioners and regulated firms must adhere in their conduct, practice and professional performance. It also provides examples of the associated outcomes that the regulated community must meet. In 2021 CILEx Regulation created a new version of the Code to apply specifically to CILEX-ACCA Probate firms and CILEX Practitioners (ACCA-Probate) whilst retaining those nine core principles and associated outcomes.

CILEx Regulation's enforcement work includes the investigation of professional conduct matters that breach the Codes. Matters may be raised by members of the public, or may be voluntarily disclosed by those we regulate.

The last few years have seen a greater focus for regulators on compliance with other areas of legislation, such as money laundering and, now in 2022, financial sanctions, as well as a heightened awareness of the impact that organised crime may have on our members and firms. For the enforcement team this has required a greater understanding of the broader range of complaints that we may receive and the potential circumstances of complainants when they contact us.

CILEx Regulation welcomes reports from the public which enables CILEx Regulation to investigate concerns relating to conduct and to decide whether we can take any action. Action will be taken in the most serious cases, where there is a real risk to the public and consumers, or to the standards expected.

Finally, I would like to take this opportunity to thank all the enforcement team staff, our panellists and their independent Clerks for their hard work and dedication during the last the year. The CILEx Regulation Board is indebted to them for their commitment, flexibility and expertise, and for their contribution to our effectiveness as a regulator.



Introduction

CILEx Regulation has three independent disciplinary panels that consider the conduct of those regulated by us, namely the:

- **Professional Conduct Panel (PCP)**
- **Disciplinary Tribunal (DT)**
- **Appeals Panel (AP)**

The PCP considers conduct matters that have been self-declared by both regulated persons and applicants for CILEX membership or subsequent authorisation, where that conduct has the potential to impact on their suitability for CILEX membership or authorisation or, to continue be a regulated as a legal professional. The PCP also considers reports of wrongdoing against regulated persons (misconduct) to determine whether there is a case of professional misconduct for them to answer.

The DT hears charges of professional misconduct against regulated persons in both contested and uncontested cases.

The AP hears appeals from CILEx Regulation and regulated persons against decisions made by the PCP and DT. It also hears appeals against decisions relating to admissions, authorisation, licencing and supervision matters.

Many cases require consideration by one of our disciplinary panels at a hearing, in other cases Enforcement staff may make delegated decisions.

This report is split into two sections:

- A review of the activity of the Enforcement Team and the independent decision- makers in 2021.
- A breakdown of the Equality & Diversity data for those affected by decisions and for our panellists.

How our Disciplinary Panels operated in 2021

In 2021, the Legal Services Board agreed to extend the temporary rule change enabling disciplinary panels to continue to operate remotely where appropriate.

Our Disciplinary Tribunal and Appeals Panel hearings have remained open to the public throughout the pandemic; however, 2021 was the first time that members of the public and third-party witnesses attended a remote (virtual) Disciplinary Tribunal hearing. This enabled a successful test of the feasibility of attendance by, and cross-examination of, several parties remotely.

Investigators continued to undertake advocacy in DT and AP hearings on behalf of CILEx Regulation rather than instructing external advocates. This has proved to be fairer and less intimidating to unrepresented individuals subject to disciplinary proceedings, as well as being efficient and more cost effective.

Training for our Disciplinary Panels this year included case law updates on:

- conduct in private life
- dishonesty and 'exceptional circumstances' to striking off [exclusion]
- bad character evidence
- adverse inferences

as well as:

- objective decision-making/unconscious bias,
- chairing disciplinary hearings, and
- delegated authority to determine certain prior conduct declarations.

We always seek engagement from our panellists and clerks on how we can improve our enforcement function. Our panellists had no significant matters they wished to be highlighted in this report. The clerks advised that by acting as the primary contact with applicants /respondents/ appellants, it had improved panel effectiveness and the trust of those subject to enforcement proceedings as to the fairness of the process. It was helpfully suggested that providing more detailed rules for the Appeals Panel, in line with the Disciplinary Tribunal, would be beneficial.

Prior Conduct Declarations

Prior conduct declarations are made by members or applicants about conduct matters such as a criminal conviction, other regulatory findings or civil judgments, which may affect their suitability to become, or remain, a regulated legal professional,

There were 875 “live” prior conduct cases in 2021. Of these, 333 were declarations made before the start of 2021. Of the remaining 542 new declarations received in 2021, 80 were by new applicants (including ACCA-Probate practitioner applicants). Other declarations were from existing CILEx members re-declaring prior conduct matters in annual renewals or making a new declaration in-year.

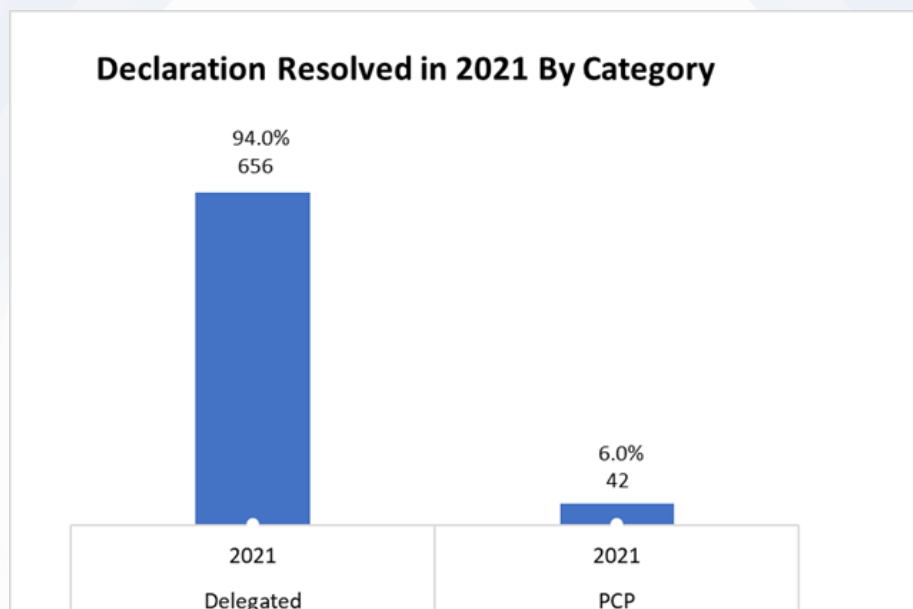
In August 2021 we made changes to the prior conduct declaration process which enabled members and applicants to view any previously declared conduct, this has significantly reduced duplicate declarations. In 2020 we received 929 declarations, which reduced to 473 declarations between January and July 2021 and then 69 from August to December 2021.

We considered our first prior conduct declarations from accountants seeking to be authorised as CILEX Practitioners (ACCA-Probate) in 2021. Of the 66 individual applications in 2021, 3 were referred to the enforcement team and these applications will be determined in 2022.

Our enquiries have highlighted the importance of undertaking character and suitability checks with other regulators to ensure that all relevant matters are considered by CILEx Regulation, even if not voluntarily declared by the applicant.

Resolved Prior Conduct Cases

In total, 79.8% (698) of all 875 prior conduct cases that were live in 2021 were resolved in 2021. The table below shows the split between those determined by delegated decision and those determined by the PCP.



Declarations Dealt with by the Professional Conduct Panel

Of the 42 cases dealt with by the PCP, 20 related to declarations received before 2021, and 22 during 2021. These include declarations of unspent criminal convictions, as well as investigations and proceedings by other regulators.

There were two appeal hearings against the PCP's refusal of membership following prior conduct declarations in 2021. Both appeals were dismissed.

Declarations Dealt with by Delegated Decision

The majority of prior conduct declarations (94%) were dealt with by delegated decision. In 2021 this accounted for 397 (73.24%) of the 542 declarations made in 2021. Many of these related to financial declarations, such as County Court Judgments (CCJs), Individual Voluntary Arrangements (IVAs) and Bankruptcies due to personal circumstances where there was no related criminal conduct or breach of the CILEX Code of Conduct and therefore did not impact on suitability.

Prior Conduct Timescales

Because the PCP deals with the more complex declarations, including criminal conduct and proceedings other regulatory bodies, the timescales for their cases are longer at 32 weeks. These cases often rely on other bodies completing their investigations before the conduct can be considered by the PCP, and so this extends the timescale.

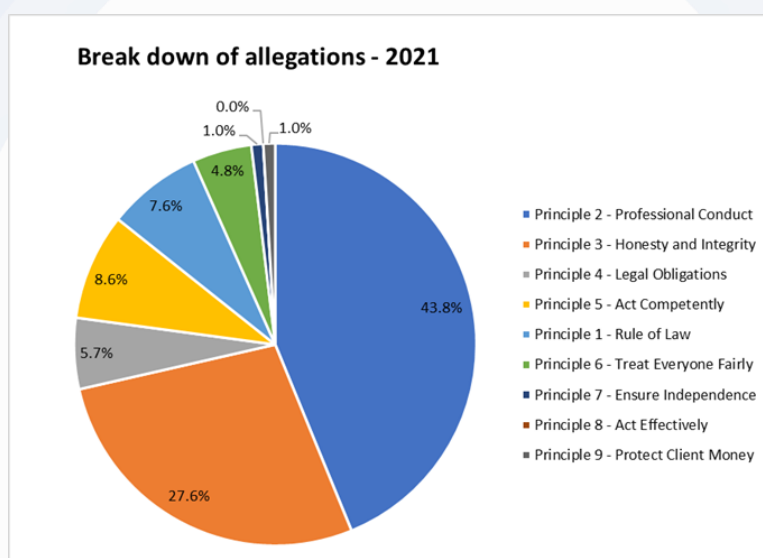
2021 saw an overall increase in caseload and timescales for prior conduct. The enforcement team will be recruiting an additional caseworker and the improvements made to the prior conduct declaration process will continue to reduce the timescales, freeing up staff time to focus on the conduct that poses the greatest risk.

Misconduct, Complaints and Allegations

There were 83 misconduct cases open at the start of 2021, the largest number since 2017¹. A further 56 reports of misconduct were received during the year. Out of these, 49 complaints related to Authorised persons (47 Fellows) and 2 complaints against authorised entities (firms).

The sources of complaints included employers, other regulators, clients, members of the public and opponents in legal disputes. In 2022 the enforcement team has started capturing more data around the source of complaints.

A breakdown of the different types of allegations received against CILEX members is shown below.



¹ Previous Investigation, Disciplinary and Appeals (Enforcement) reports can be found on our website here [Annual reports - CILEX Regulation](https://cilexregulation.org.uk/annual-reports) for comparison

Allegations based on Principle 2 (Professional Standards) and Principle 3 (Honesty and Integrity) are consistently the most common types of concerns reported to us. They accounted for 71.4% of the total complaints received in 2021. These initial allegations do not always translate to formal allegations or charges and may either be modified or rejected as an investigation progresses.

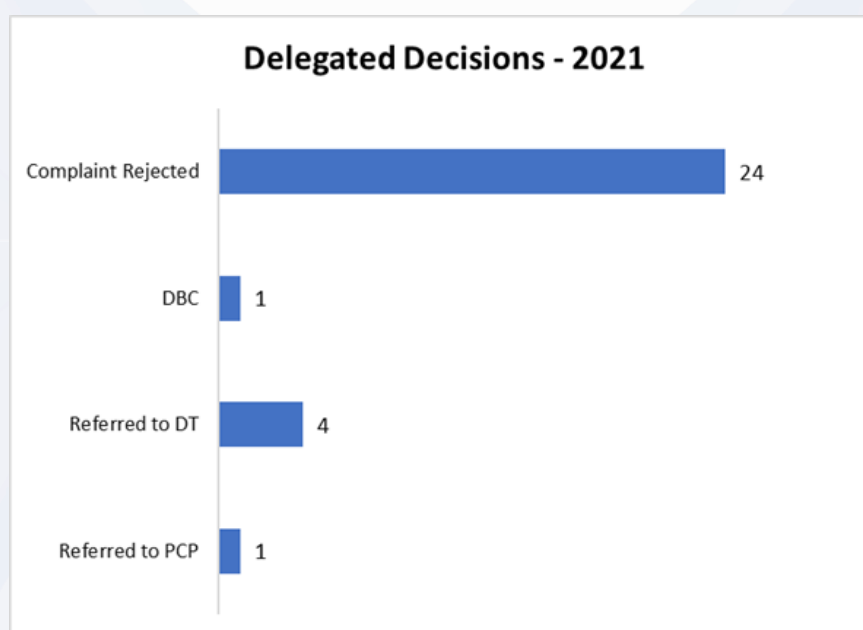
In 2022, we have started a more detailed analysis of the types of allegations that CILEx Regulation formally raises with regulated persons during its investigations and against which it may subsequently take action.

The most serious types of conduct against which we took action in 2021 included:

- criminal convictions for fraud and other criminal conduct;
- conducting reserved activities without being entitled;
- misappropriating client funds;
- deliberately and dishonestly failing to disclose prior conduct; and
- adverse findings made by other regulators and professional bodies.

Delegated Decisions for misconduct cases

In 2021, there were 30 delegated decisions taken by officers. The breakdown of decisions is shown in the table below.



A larger proportion of complaints were rejected in 2021, compared with 2020, which saw 17 rejections². Complaints are rejected where there is no evidence available to substantiate an allegation; the facts alleged do not disclose misconduct; CILEx Regulation has no jurisdiction; or where more than a year has elapsed since the conduct complained of took place.

The same number of cases were referred directly to the DT in 2021 as in 2020 and we saw fewer determinations by consent.

² See 2020 Annual report [Investigation-Disciplinary-and-Appeals-Rules-Report-2020.pdf](https://cilexregulation.org.uk/investigation-disciplinary-and-appeals-rules-report-2020.pdf) (cilexregulation.org.uk)

Panel Decisions for misconduct cases

Professional Conduct Panel

During 2021 the PCP considered three cases relating to professional misconduct. One case resulted in a sanction of a warning and reprimand after the member admitted the allegations and agreed for the PCP to dispose of the case by the sanction. The PCP also upheld two Officer decisions to reject a complaint following the complainant's request for a review of the Officers' decisions.

Disciplinary Tribunal

The Disciplinary Tribunal heard a total of five misconduct cases in 2021, one of which was referred in December 2020. Three of the cases concerned Fellows. All charges were found proven and resulted in exclusion from membership. There was one appeal against a Disciplinary Tribunal decision, which was dismissed by the Appeals Panel.

Appeals Panel Decisions

The appeals panel heard a total of three appeals in 2021.

Two of the appeals were against the PCP's decisions to reject applications for CILEX membership due to the Appellant's prior conduct declarations. The other appeal was made against a Disciplinary Tribunal decision to exclude an individual from CILEX membership. All three appeals were dismissed.

Timescales

CILEX Regulation is aware of the need to communicate to the regulated community and the public details of our anticipated timescales to complete misconduct investigations. For this reason, we notify information-givers of our expected timescales to determine their allegations and explain why some cases may take longer. We also provide such information for the public on our website.

How we delivered our Enforcement function

The Enforcement Team has continued to work primarily remotely whilst ensuring regular contact with team members and disciplinary panels.

Staffing

There were a number of changes to staffing in the Enforcement Team during 2021. It is now led by two Managers who retain a significant case load of more complex cases, alongside their own dedicated management functions. A Paralegal Investigation Officer was also recruited in 2021.

Oversight of the enforcement function transferred to a new Director of Operations in January 2022, which allows greater flexibility to adapt to workflows and improved oversight as to how operational matters impact on our enforcement function.

Communications

The enforcement team has ensured the availability of guidance and material to the regulated community, the public, and other stakeholders who may rely on CILEX Regulation's enforcement work.

The CILEX Journal and Regulation Matters have been used to support our regulated community in understanding their obligations, our expectations, and how we operate, for example the circumstances in which an individual's conduct in their private life may engage the Code of Conduct.

The information available on the website has been improved, particularly for members of the public who may have concerns about those regulated by CILEX Regulation. In collaboration with the Solicitors Regulation Authority and Legal Choices, publication of disciplinary outcomes has improved in clarity and consistency. We have also updated our prior conduct guidance for our regulated community.

Processes and rules

Improvements to our processes have continued, particularly the streamlining of the prior conduct declaration process and further areas for improvement continue to be identified for implementation in 2022.

Following LSB approval, the Enforcement Rules were extended to cover the new CILEX-ACCA Probate firms and CILEX Practitioners (ACCA-Probate).

We will seek to identify further rule changes and, with the implementation of risk-based supervision, to start to develop a more transparent, risk-based approach to enforcement.

Conclusion

The data in this report does not identify any significant concerns to highlight.

The LSB assessed CILEX Regulation's performance outcomes, including enforcement, as 'met' for 2021. Owing to the staffing challenges in the enforcement team in 2021, adherence to timescales remains a significant challenge. This is improving in 2022 as remaining vacancies in the team are filled.

In addition, we continue to improve data collection and analysis of enforcement cases, enabling us more effectively to draw out trends in the types of allegations and adverse findings made. This will inform development of our risk-based approach and case management.

As risk-based supervision is introduced in 2022 we will move forward with our plans for risk-based enforcement.

We are introducing more guidance for our regulated community to assist with our enforcement work and will be consulting with our regulated community and stakeholders on our approach to enforcement in 2022 and beyond.

Equality and Diversity

At CILEx Regulation, we value diversity, remain committed to eliminating unlawful discrimination, victimisation and harassment. We endeavour to treat everyone fairly and equally, regardless of their background, and to remove any barriers faced by those with particular protected characteristics. We are also committed to continuous improvement and ensuring that our processes are fair and free from overt or unconscious bias. In 2021 we took additional steps towards ensuring that our practices and procedures reflect, and are relevant to, the population we serve. For example, we engaged an external training provider to deliver interactive training on objective decision making to both our independent panels and enforcement staff.

Since the end of 2020, it has been mandatory for all individuals to provide diversity data. when applying for and renewing their CILEX membership each year. In 2021 we collected the largest set of diversity data for CILEX members to date with 15,260 responses. The results can be found in our 2021 Diversity Report³.

³ [Diversity-Report-2021.pdf \(cilexregulation.org.uk\)](https://cilexregulation.org.uk/Diversity-Report-2021.pdf)

The data collected allows us to monitor all protected characteristics, as well as socio economic background and caring responsibilities.

We are using this data to help us gain a better understanding of those we regulate and to identify whether our enforcement and disciplinary processes have any disproportionate impact on those who share particular protected characteristics.

In 2021 we also began monitoring the composition of our independent disciplinary panels to determine whether they are reflective of those we regulate, as well as the UK population as a whole. In 2022 we are working to include the diversity data of all decision makers, including Enforcement Staff and widening our analysis to cover all protected characteristics and social mobility factors.

Diversity Profile of our Disciplinary Panels

Diversity data for the 24 panel members who sit across our disciplinary panels is shown below and is broken down by age, ethnicity and gender, according to each panel - the Professional Conduct Panel (PCP), Disciplinary Tribunal (DT) and Appeals Panel (AP). The figures are reported in percentages to give a better overview and comparison against the CILEX membership as a whole.

Ethnicity	PCP	DT	AP	CILEX Membership 2021
White	62.5%	66.6%	66.6%	84.4%
Asian or Asian British	25.0%	-	16.6%	7%
Black or Black British	-	11.1%	16.6%	3.5% ⁴
Mixed	-	-	-	2.4%
Other	-	-	-	0.3%
PNS/Not recorded	12.5%	22.2%	-	2.4%

Gender	PCP	DT	AP	CILEX Membership 2021
Female	62.5%	44.4%	83.3%	76.9%
Male	25%	33.3%	16.6%	22.3%
Other	-	-	-	0.1%
PNS/Not recorded	12.5%	22.2%	-	0.8%

Age	PCP	DT	AP	CILEX Membership 2021
<35	-	-	-	35.3%
35-44	-	-	50%	27.2%
45-54	25%	22.2%	33.3%	20.4%
55 -64	37.5%	44.4%	-	12.2%
65+	12.5%	11.1%	16.6%	2.9%
Prefer not to say	12.5%	-	-	-
Not recorded	12.5%	22.2%	-	1.7%

⁴ Note the 5.5% figure on page 4 of the diversity report should state 3.5%

The percentage of panel members with incomplete diversity data is too high to draw any firm comparisons with the composition of the CILEX membership, or those who were the subject of prior conduct and misconduct cases in 2021. There are also less than 10 members of each panel, so whilst we cannot conclude that our panels are reflective of CILEX Membership, the figures do broadly indicate that ethnic minority groups may be overrepresented within our panels when compared to the composition CILEX members and the UK population.

The largest age group within membership, the under 35s which is reflective of the composition of the UK workforce, appears to be underrepresented within our panels. The figures below do not indicate any disproportionate impact on those within the under 35 age category who were subject to enforcement and disciplinary proceedings before our disciplinary panels in 2021. The overwhelming majority of prior conduct declarations by individuals within this age category were approved by the PCP. No-one within this category was subject to proceedings before the Disciplinary Tribunal or Appeals Panel.

We are working with our panels in 2022 to improve the diversity data, including understanding whether and how we can resolve any concerns they may have around disclosing their diversity data. We are also considering how we may encourage more applications from panel members from younger age groups as part of the next round of recruitment. We recognise that the level of experience required to sit on a panel may be a challenging factor in helping us improve the age diversity of our panels.

Prior Conduct Declarations

The tables below show the diversity make up of all 875 prior conduct cases that were “live” at any point in 2021, broken down by age, ethnicity, and gender.

We have also broken down the age, ethnicity, and gender for all 698 prior conduct cases that were resolved in 2021. This includes cases that were either determined by the PCP and/or enforcement staff. Enforcement staff decide which cases to progress to resolution, either through a delegated decision, or a referral to the PCP. This is usually done on a first in, first out basis, although declarations made as part of applications for membership and authorisation, including renewals, may be prioritised. The figures indicate that the composition of cases that were resolved were broadly reflective of all live cases in 2021.

Ethnicity	CILEX Membership 2021	Prior Conduct Cases Resolved in 2021 (698)	All Prior Conduct cases live (875)
White	84.4%	78.1% (545)	73.8% (646)
Asian	7.0%	6.7% (47)	7% (61)
Black	5.5%	7.9% (55)	8.8% (77)
Mixed	2.4%	1.9% (13)	1.6% (14)
Other	0.3%	0.7% (5)	0.7% (6)
PNS / Not recorded	2.4%	4.7% (33)	8.1% (71)

Gender	CILEX Membership 2021	Prior Conduct Cases Resolved in 2021 (698)	All Prior Conduct cases live (875)
Female	76.9%	67.5% (471)	63.8% (558)
Male	22.3%	28.5% (199)	28.9% (253)
Other	0.1%	0.6% (4)	0.5% (4)
PNS / Not recorded	0.7%	3.4% (24)	6.9% (60)

Age	CILEX Membership 2021	Prior Conduct Cases Resolved in 2021 (698)	All Prior Conduct cases live (875)
16-24	5.7%	0.6% (4)	0.6% (5)
25-34	29.6%	17.3% (121)	16.8% (147)
35-44	27.2%	35.2% (246)	32.8% (287)
45-54	20.4%	26.9% (188)	25.7% (225)
55-64	12.2%	13.8% (96)	14.5% (127)
65+	2.9%	3.7% (26)	3.8% (33)
PNS/Not recorded	1.7%	2.4% (17)	5.8% (51)

Professional Conduct Panel Decisions - Prior Conduct

The tables below show the diversity composition of the 42 prior conduct declarations that were determined by the Professional Conduct Panel in 2021, again broken down by ethnicity, age, and gender.

Rejected cases are applications for CILEX membership or authorisation that were rejected by the PCP due to prior conduct. Approved cases include those cases where the PCP either issued a sanction and membership continued, or found that the prior conduct did not affect suitability. Our prior conduct case recording system does not capture sanction data separately.

We have not reported separately the diversity composition of the 656 prior conduct cases that were determined by delegated decision (decisions made by enforcement staff). This is because whilst enforcement staff can decide which cases are dealt with first, they have very little discretion as to the types of cases that get referred to the PCP. They also have no power to reject applications. As such, any comparison of PCP against the diversity composition of all delegated decision and/or all live prior conduct cases in 2021 should be treated with caution.

The figures below do not highlight any significant areas of concern as the number of cases considered are too low to identify trends or draw any firm conclusions. Any differential outcomes will also likely to depend on the nature and circumstances of the conduct being considered, as well as other factors such as the level of engagement and co-operation by the member or applicant.

Ethnicity	Approved	Rejected
White	40.5% (17)	-
Asian	21.4% (9)	2.4% (1)
Black	14.3% (6)	-
Mixed	9.5% (4)	-
Other	-	-
PNS / Not recorded	4.8% (2)	7.1% (3)
Total	90.5% (38)	9.5% (4)

Gender	Approved	Rejected
Female	42.9% (18)	-
Male	42.9% (18)	-
Other		2.4% (1)
PNS / Not recorded	4.8% (2)	7.1% (3)
Total	90.5% (38)	9.5% (4)

Age	Approved	Rejected
16-24	-	-
25-34	31% (13)	-
35-44	33.3% (14)	-
45-54	11.9% (5)	-
55-64	7.1% (3)	2.4% (1)
65+	4.8% (2)	-
PNS / Not recorded	2.4% (1)	7.1% (3)
Total	90.5% (38)	9.5% (4)

Misconduct

All the individuals subject to misconduct investigations and proceedings in 2021 provided us with diversity data.

The table below shows the diversity data for the 139 misconduct cases that were live in 2021, broken down by ethnicity, gender, and age. This includes all cases that were opened in 2021, or earlier if they were either determined or still being considered in 2021.

We have also included comparison data of the composition of CILEx members whose misconduct cases were decided by Enforcement staff (delegated decisions).

Ethnicity		White	Asian	Black	Mixed	Other	PNS/ NR
All Misconduct cases (139)		67.6% (94)	10.8% (15)	9.4% (13)	2.2% (3)	-	10.1% (14)
Delegated Decisions (30)	Complaint rejected (24)	53.3% (16)	10.0% (3)	3.3% (1)	6.7% (2)	-	6.7% (2)
	Determination by Consent (1)	3.3% (1)	-	-	-	-	-
	Refer to PCP (1)	-	3.3% (1)	-	-	-	-
	Refer to Disciplinary Tribunal (4)	6.7% (2)	-	6.7% (2)	-	-	-

Gender		Male	Female	Other	PNS/ NR
All Misconduct cases (139)		40.3% (56)	54% (75)	-	5.8% (8)
Delegated Decisions (30)	Complaint rejected (24)	36.7% (11)	36.7% (11)	-	6.7% (2)
	Determination by Consent (1)	-	3.3% (1)	-	-
	Refer to PCP (1)	3.3% (1)	-	-	-
	Refer to Disciplinary Tribunal (4)	6.7% (2)	6.7% (2)	-	-

Age		16-24	25-34	35-44	45-54	55-64	65+	PNS/ NR
All Misconduct cases (139)		-	18.7% (26)	29.5% (41)	24.5% (34)	15.8% (22)	8.6% (12)	2.9% (4)
Delegated Decisions (30)	Complaint rejected (24)	-	20% (6)	23.3% (7)	10.0% (3)	20% (6)	6.7% (2)	-
	Determination by Consent (1)	-	-	3.3% (1)	-	-	-	-
	Refer to PCP (1)	-	3.3% (1)	-	-	-	-	-
	Refer to Disciplinary Tribunal (4)	-	-	3.3% (1)	6.7% (2)	3.3% (1)	-	-

The figures above indicate that CILEX members who identify as Black, Asian, or male were overrepresented in the total misconduct complaints received when compared with the CILEX membership. CILEX Regulation has no control over complaints received about members and thus it is difficult to address directly any overrepresentation in any protected group. However, we will look at the source of complaints to understand whether this overrepresentation can be linked to any particular type of complainant.

Enforcement staff decisions were split evenly in terms of gender. The majority of complaints against Asian members were also rejected. However, the overrepresentation of black members continued in referrals to the Disciplinary Tribunal, although at a significantly lower level.

As with prior conduct cases, differential outcomes are likely to depend on the nature and circumstances of the conduct being considered, the level of engagement by the member and strength of evidence. For example, adverse findings of other regulators carry significant evidential weight and generally result in a referral to the Disciplinary Tribunal. In 2022 we have started tracking decisions made at each stage of the disciplinary process against such factors to identify whether there are any trends of concern relating to internal decisions.

Professional Conduct Panel decisions – Misconduct

The diversity data for PCP decisions made in 2021 is largely reflected in the delegated decisions made by Enforcement staff. This is because the PCP upheld two decisions made by enforcement staff to reject a complaint, following the complainants' request for a review, and approved a recommendation for a determination by consent (DBC), a type of settlement agreement.

Only one misconduct case was referred to the PCP for determination following an admission by the member. The PCP issuing an agreed sanction.

Disciplinary Tribunal decisions

There were five Disciplinary Tribunal proceedings in 2021, all of which resulted in the sanction of exclusion. Since all cases were referred directly to the Disciplinary Tribunal by enforcement staff, the diversity data is included earlier in the report in the decisions made by enforcement staff.

Appeal Panel Decisions

The appeals panel heard 3 appeals in 2021, so the sample size is too small to analyse or draw any firm conclusions.

Final Comments on EDI

Equality, Diversity and Inclusion is a key strategic objective for CILEX Regulation. We have continued to improve the way we record, monitor and report on equality and diversity data for transparency and accountability purposes. We have also continued with targeted training and induction for enforcement panel members and staff.

Although the number of disciplinary cases CILEX Regulation deals with each year are not large enough to draw firm conclusions, the small samples above do indicate that more work is needed around data collection and analysis to gain better insight into EDI factors surrounding our enforcement processes.