

Date	23 February 2023
Item	10.0
Title	Director of Operations' Report
Author	David Pope, Director of Operations
Purpose	This paper provides the Board with an update on the work of the Operations Directorate undertaken since the last meeting.
Recommendation	The Board is asked to NOTE the report, in particular the new section on Economic Crime work (P38-60) and the potential impact of CILEX's acquisition of the Institute of Paralegals on the capacity of the Enforcement team (P65-71).
Timing	N/A
Impact Assessment	N/A
Impact on Regulatory Objectives	<p>The work covered in this report impacts on the following:</p> <ul style="list-style-type: none"> - encouraging an independent, strong, diverse and effective legal profession; - protecting and promoting the consumer and public interest; and - promoting and maintaining adherence to the professional principles. <p>And the proposed objective:</p> <ul style="list-style-type: none"> - promoting the prevention and detection of economic crime
Implications for resources	The PAS Team manager is leaving CRL at the end of March. CILEX's announcement in relation to The Institute of Paralegals will have an impact on the resources within the Enforcement Team in 2023 which is unbudgeted within the 2023 PCF.
Impact on consumer empowerment	N/A
Impact on ongoing competence	Currently monitored via CPD non-compliance, this will change with adoption of the LSB requirements for assessing ongoing competence.
Publication status	For partial publication: <i>text in italics is proposed for redaction</i>
Appendices (in supporting papers pack)	None

Introduction

1. This paper provides the Board with an update on the work of the Operations Directorate and includes:
 - An update on the work of the Practitioner Team,
 - An update on the work of the Entity Team,
 - An update on the work relevant to the proposed new regulatory objective on Economic Crime, and
 - An update on the work of the Enforcement Team.

2. In addition to the data contained in the Operations Report, CRL publishes its KPI's on a quarterly basis (see COO Report, Item 7). However, performance data recording and reporting are under review and the data for the May Board reported through this report may be amended for approval by the Board.

PRACTITIONER TEAM UPDATE

Rule change applications

Qualifying Employment review

3. On 11 January 2023, CRL received approval from the Legal Services Board for the following amendments to regulatory arrangements relating to experience required prior to applying for admission as a chartered legal executive:
 - a) To amend the term “qualifying employment” to become “qualifying experience”;
 - b) To replace the requirement for “wholly legal work” with “work that contributes to the provision of legal services”;
 - c) To replace the requirement for 3 years’ experience with a total of 2,300 hours,
 - d) To remove the requirement for an applicant to demonstrate having been in qualifying employment for 2 consecutive years immediately preceding the date of an application for admission as a chartered legal executive;
 - e) To amend the period of experience recognised from an applicant’s completion of the Legal Practice Course, as recognised by the Law Society of England and Wales, or Bar Training Course, as recognised by the Bar Council, from 43 weeks qualifying employment to become 644 hours qualifying experience; and
 - f) To amend the decision-making powers of an Officer to remove references to consideration of experience against the existing definition of qualifying employment.
4. New guidance documents have been drafted to accommodate the changes and the CRL website has been updated. CRL has received positive feedback in relation to the new requirements, including on social media.

Recognition of Professional qualifications

5. CRL has been working on implementing the requirements of the Professional Qualifications Act 2022. This Act replaces all the transitional legislation that was in place following the exit from the EU.
6. On 21 November 2022, an Exemption Direction alteration was approved by the LSB, which confirmed the changes to amend the CRL Temporary Rules for recognition of lawyers qualified in the EEA and to implement the Professional Qualifications Act 2022.
7. This has now concluded all the necessary work under this piece of legislation.

Operations

8. The PAS team manager will be leaving CRL at the end of March 2023. With the current challenges to recruitment faced by CRL, owing to the current uncertainty on its future, it is unlikely that CRL would be able to recruit to this role. The responsibilities for this

role will be covered by the Director of Operations and The Chief Operating Officer until the outcome of the LSB's investigation is known.

9. The work on the risk matrices has been completed and they are now live in the CRM system. CRL is working on analysing and reporting on the data, which will feed into the work on ongoing competence as well as assisting with assessment of complaints received by the enforcement team.
10. CRL will also consider other uses for this rich source of data.

Qualifying Employment (QE)

Applications received

Qualifying Experience Applications												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2023												
2022	61	65	62	70	57	72	43	67	58	43	42	28
2021	64	64	86	80	77	76	61	50	53	74	62	79
2020	83	88	84	38	37	57	54	45	49	59	58	68

11. The average time to first assessment for QE in December 2022 was **18** working days which remains satisfactory.
12. The number of applications received in 2022 was 668, which was lower than in 2021 when 826 applications were received. This is most likely the result of changing business practices following the pandemic, the reduction in CILEX members in lower grades of membership, and the impact of the SQE which has improved the route to become a solicitor by removing the training contract bottleneck.
13. CRL would expect to see the reduced QE application numbers reduce the number of WBL applications in 2025, although this may be mitigated by the change to Qualifying Experience, which should allow applicants to apply for Fellowship earlier than if the QE change had not been made.

Work Based Learning (WBL)

Applications received

Work Based Learning Applications												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2023												
2022	42	37	71	70	62	52	48	77	65	65	60	38
2021	56	58	62	83	70	43	53	41	58	55	53	58
2020	43	49	48	53	44	46	42	52	77	50	61	42

14. The average time to first assessment of WBL applications in 2022 was **48 working days (9 weeks + 3 w/days)**. The oldest file waiting to be assessed on 23 January 2023 was **7 weeks + 2 w/days**.

15. The number of applications received in 2022 was 687, which remains in line with 2021 when 690 applications were received.

Practice Rights & Advocacy

Practice Rights & Advocacy Applications												
2022												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec
Applications received	4	3	5	2	3	1	2	3	3	1	2	6
Applications authorised	3	5	8	3	6	4	6	4	3	3	1	4
2021												
Applications received	4	1	5	4	3	1	4	3	3	5	4	7
Applications authorised	1	1	4	4	4	3	3	0	0	0	3	4

16. The number of practice rights holders should increase in Q1 2023 when the results of the courses set out below are known and participants are authorised. The increased demand for practice rights is being driven in part by changes made by other legal sector stakeholders, such as HM Land Registry, who now only recognise CILEX Conveyancing Practitioners on their digital systems rather than Chartered Legal Executives. CILEX's drive to create CILEX Lawyers (Chartered Legal Executives holding practice rights) is also influencing applications.
17. Guidance in relation to the work Chartered Legal Executives may undertake if they do not hold additional rights may also create increased demand for practice rights.

Courses

18. Barbri Altior hosted a civil advocacy skills course in November 2022 and results were issued in December 2022.
19. Barbri Altior will be hosting a family advocacy skills course in February 2023. This course will be attended by at least 6 delegates.
20. CRL received an application from Mercia College to deliver probate training for ACCA individuals seeking probate practice rights. CRL has completed the mapping of the Mercia probate course against CRLs competency framework and expects to accredit the course by February 2023. The next scheduled course at Mercia (who provide the course for ICAEW) is April 2023. CRL has received enquiries from ACCA members about course availability, and accreditation of the course in February will meet this demand.

ULaw training and assessment for practice rights

21. ULaw has scheduled four assessment windows for 2023. These assessments will cover the following areas of practice; civil litigation, family litigation, conveyancing and probate. The decision to prioritise these areas was based on the number of Fellows specialising in each area. Immigration and criminal litigation will follow in 2024.

22. ULaw held an assessment window at the end of 2022 and the results are expected in January 2023. The next assessments will be held in April 2023. CRL confirmed the eligibility of 62 Fellows for the 2022 assessment session.

CPD Non-Compliance

Compliance 2021/2022	Year	30/09/2022	23/01/2023	% reduction since 1 October 2022
Associate Prosecutors		15	5	66.7%
Fellows		757*	314	58.5%
Advanced Paralegals (Graduates)		505	448	11.3%
WBL reduction		137	100	27.0%
Paralegals (Associates)		1410	752	46.7%
Total		2824	1619	31.7%

* this figure was reduced to 700 after any submission errors were corrected.

23. The above table sets out the achievement of the team in dealing with CPD non-compliance since the CPD year 2021/22 closed on 30 September 2022.
24. The team will be contacting members in the 'Associate Prosecutors', 'CILEX Fellows', 'Advanced Paralegals' and 'WBL reduction' categories on 23 January 2023 regarding continued non-compliance with the CPD regulations.

ENTITY TEAM UPDATE

Policy

FCA / Claims Management Activities

25. CRL has been working with the Financial Conduct Authority (FCA), the Solicitors Regulation Authority (SRA) and Bar Standards Board (BSB) on the introduction of new rules related to claims management activities and fee caps.
26. CRL met with the SRA and BSB in December 2022 to discuss this ongoing work and the plans that each regulator had for this work in 2023. CRL has seen no issues related to claims management work with applicants or existing firms but will continue to review how these rules can be progressed in a proportionate manner.

Lender Panels / Banks

27. There has been no additional work on lender panels/banks since the November Board report.

Professional Indemnity Insurance (PII)

28. Any proactive work with insurers is now on hold as they require greater certainty on CRL's long term future following CILEX's proposed changes to regulatory arrangements before they will discuss offering new facilities.

2022												
Number at the pre-authorisation stage	5	5	4	7	7	4	3	2	2	1	1	1
Number at Provisional Authorisation stage	0	0	1	0	1	1	1	1	0	0	0	0
Number of authorised firms	24	24	24	25	25	25	25	24	23	23	22	22

34. Whilst CRL anticipates receipt of two finalised entity applications in the first quarter of 2023, CRL is also aware that two of its existing conveyancing firms will close in February 2023. This has been caused by lack of access to PII, which is as a result of the CILEX announcement and subsequent LSB investigation hampering CRL's ability to speak with alternative suppliers.

Annual Returns

35. All Annual Returns for 2023 were completed before the close of the year, with advice provided where necessary. There are two late Accountants Reports; one of which is expected in early February 2023. The other relates to a firm that is not currently engaging with CRL and a referral to the Enforcement team may become necessary.

Other matters

36. The three unregulated firms for which CRL acts as the Anti-money Laundering Supervisory body, all completed their returns for 2022 and continue to be supervised in 2023.
37. The firms regulated by CRL continue to express concern about the uncertainty regarding CILEX's future regulatory arrangements.

ECONOMIC CRIME UPDATE

38. CRL has previously advised the Board of a new ninth regulatory objective contained within the Economic Crime and Corporate Transparency Bill. This focuses specifically on ensuring legal regulators promote adherence to the legislation to prevent economic crime. This has been drafted in the Act to read as follows:

“promoting the prevention and detection of economic crime.”

39. This new regulatory objective is likely to be a focus for the LSB once implemented; therefore, CRL believes that it is important for the Board to have all aspects of the work that CRL carries out related to this objective in one section of this report. This will allow a full understanding of the risks that firms face and the work that CRL carries out to supervise them and protect the public.

Economic Crime and Corporate Transparency Bill

40. The Economic Crime and Corporate Transparency Bill has now completed the committee stage. It will deliver:
- reforms to Companies House
 - reforms to prevent the abuse of limited partnerships

- additional powers to seize and recover suspected criminal cryptoassets
- reforms to give businesses more confidence to share information in order to tackle money laundering and other economic crime
- new intelligence gathering powers for law enforcement and removal of regulatory burdens on business

41. In this case “economic crime” has the meaning given by section 153(1) of the Economic Crime and Corporate Transparency Act 2022. The offences are extremely wide ranging and outside of the scope of CRLs normal supervision, although by their nature would clearly be considered as misconduct.

42. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY.**

43. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY**

Anti-Money Laundering (AML) Supervision

44. CRL had a supervisory review meeting with Office for Professional Bodies AML Supervision’s (OPBAS) on 15 December 2022. The discussion covered:

- CRL’s approach to AML supervision in 2022 and any changes for 2023
- What AML risks CRL had identified
- Sanctions work
- CRL’s annual AML supervision report, and
- The impact of CILEX’s review of regulatory arrangements and the LSB investigation.

45. OPBAS asked whether CRL’s AML supervision had been affected by CILEX’s action and the LSB investigation. CRL reassured OPBAS that, notwithstanding the ongoing issues, CRL had maintained its focus on AML supervisory activities. This was evidenced by:

- a. the work on sanctions,
- b. the development of a new AML certificate for CRL regulated firms in 2023 to better inform its AML supervisory work and the risks that its firms faced, and
- c. the positive comments on AML & Sanctions work from the LSB in the Regulatory Performance Assessment.

46. The next meeting with OPBAS has been suggested for the end of March 2023. This will take place after the LSB investigation outcome is known.

47. OPBAS held a workshop on the risks related to Proliferation Financing on 16 November 2022. Proliferation financing is defined as the provision of funds or financial services used for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their means of delivery and related materials (including both technologies and dual-use goods used for non-legitimate purposes), in contravention of national laws or, where applicable, international obligations. CRL has not identified this as a risk for its firms.

48. CRL attended the OPBAS Trust & Company Service Provider Project Workshop on 8 December 2022. This focused on risks related to company formation and trust activities across the accountancy and legal sector and how they can be fed into the next National Risk Assessment. OPBAS will be publishing a table of identified risks in 2023.
49. The revised OPBAS sourcebook was published in January 2023. The major changes that will impact on CRL's AML supervision relate to:
 - Focus on management information to inform decision making
 - Supervisors having a Deputy Single Point of Contact (SPOC)
 - Succession planning for AML
 - Emerging risk trends
 - Definition of desk based reviews
 - Information sharing
 - Suspicious Activity Reports (SARS) – Money Laundering Reporting Officer (MLRO) / Deputy MLRO – quality of SARS
 - Reg 46A – content of annual AML reports
 - Checks at membership renewal.
50. CRL will be reviewing the new expectations and how these can be integrated to its policies and procedures.
51. CRL attended the Intelligence Working Group and the Legal Regulators AML Forum on 18 January 2023, the Legal Sector Affinity Group (LSAG) meeting on 20 January 2023 requested by the Law Society to discuss changes to identity verification and will attend the next LSAG and AML Supervisors Forum on 21 March 2023.
52. At the end of 2021 HMT published a Call for Evidence on a Review of the UK's AML/ Counter Terrorism Financing (CTF) regulatory and supervisory regime. In the consultation they suggested several options related to a review of the supervisory regime to improve effectiveness. Applied to the legal sector AML supervisors, these were broadly:
 - a) An extension of OPBAS's existing powers.
 - b) Partial consolidation of legal sector AML supervisors
 - c) Consolidation of legal sector AML supervision to one supervisor for each devolved authority
 - d) Consolidation of all legal and accountancy AML supervisors with one new overarching supervisor.
53. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY**
54. The Economic Crime Levy is due to be collected in 2023 but to date none of the AML supervisors have been advised of progress with arrangements. No CRL firms will be required to pay the levy.

Sanctions

55. CRL attended the latest LSB sanctions roundtable meeting on 24 November 2022 at which the Office of Financial Sanctions Implementation (OFSI) provided an explanation of the new legal fees general licence. This licence, which expires on 27 April 2023, allows firms to be paid for specific activities to a person designated under either the **Russian or Belarus regime**, including funds needed to meet basic needs of the individuals and entities and payment of fees for any legal representation that they might seek. This was put in place because of the increasing volumes of licence requests that OFSI have faced.
56. At the meeting the MoJ provided an update on policy development in relation to the Government announcement on 30 September 2022 that there will be a ban on the provision of certain professional services, including "transactional legal advisory services" as part of the ongoing response to Russia's war in Ukraine. It is unlikely there will be a statutory instrument coming forward until March 2023.
57. All regulators again requested improved information-sharing from OFSI and the LSB held a further meeting between OFSI, MoJ, OPBAS and the SRA & BSB on 11 January 2023 to discuss arrangements for improving information sharing activities between them.
58. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY**
59. The financial sanctions regime now includes a ban on providing trust services to those connected with Russia or to a designated person.
60. All changes to the sanctions regime have been communicated to our regulated firms and information has been added to the Financial Sanctions page on the CRL website.

ENFORCEMENT TEAM UPDATE

Rule change: remote hearings

61. The application to the LSB to allow for a presumption for remote hearings was approved on 2 December 2022. The policies and processes to govern remote hearings are now in force and CRL will monitor their effectiveness during 2023.

Other Enforcement matters

62. Following the LSB's Regulatory Performance Assessment (RPA), CRL has carried out a review of the published comments relating to Enforcement in preparation for the LSB deep dive on Enforcement expected in 2023.
63. Whilst Enforcement was assessed as 'sufficient' under the RPA, there are a number of enhancements that CRL has identified from the full RPA report, which will help in continuing to develop the service offered to our regulated community and the public. These include:
 - Formal policy for prioritisation of complaints including use of risk matrices.
 - Management of complaints, including:
 - reviewing policies to formalise approach.

- keeping complainants informed
- understanding and managing backlogs
- Review KPIs to ensure they remain fit for purpose.
- Review information on treatment of enforcement cases for benefit of consumers and the regulated community – ensure it is user friendly and outcomes-focused and includes indicative timescales - use comparisons with other regulators sites.
- Progress the planned enforcement rules review set out in the business plan.

64. The intention is for these activities to be carried out by the end of Q2 2023.

Institute of Paralegals

65. On 16 January 2023 CILEX announced the acquisition of the Institute of Paralegals (IoP) and Professional Paralegal Register (PPR). The issues that will impact on the Enforcement team relate to two main areas:

- Managing the additional prior conduct declarations made by c1000 new CILEX members in bulk, and
- The practising rules and separate complaints process that PPR has in place that will conflict with the CRL Enforcement Rules.

66. In relation to prior conduct, as CRL was only notified of the acquisition by CILEX a few days before the public announcement and after the date of the acquisition, the central issue is ensuring sufficient capacity to process the additional new declarations of prior conduct and the consequent need for additional Professional Conduct Panels (PCP), none of which has been planned for in 2023.

67. Based on our recent experience with ACCA members (a regulated community), it would not be unreasonable to expect that they could be around 30-40 cases from the IOP will have to be considered by a Professional Conduct Panel. However, this number could vary quite significantly as the population of the IOP is different.

68. Each case of declared prior conduct will create cost related to preparing the papers for consideration by the PCP. Depending on the type of conduct declared, there could be 4/5 additional Panels required. This additional cost and implications on staff resourcing is not covered by the 2023 PCF as CRL was unaware of the additional workload.

69. CRL has requested sight of the IOP and PPR member data as soon as possible to enable early due diligence to be completed on these members.

70. In addition, CRL would want to receive new prior conduct declarations over a period (from Q2 2023), rather than receiving all declarations on 1 January 2024. In either case, however, this additional unbudgeted and un-resourced additional work for the enforcement team will have a knock-on effect to the existing regulated community seeking authorisations etc. where prior conduct is a consideration.

71. With regard to the PPR practising rules and complaints procedure, no action can be taken until CRL has clarity on CILEX's proposals for the PPR. However, this does have the potential to confuse the public, consumers and members alike as to regulatory requirements and options for redress. The Enforcement Team has concerns that they



will be faced with challenges from the public and other regulators as to why CILEX has differing policies and processes in place for different members.

Operational

72. The following table sets out the number of prior conduct declarations and misconduct complaints that CRL has received over the last three years.

	2020	2021	2022
Misconduct Complaints	65	58	73
Prior Conduct declarations	945	517	264

73. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY**

74. **REDACTED – CONFIDENTIAL INFORMATION PROVIDED BY THIRD PARTY**

Prior conduct

Declarations received

Prior Conduct Declarations												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
Declarations received	18	20	16	22	22	17	18	17	18	19	43	28
No of cases resolved	13	17	21	30	27	33	22	16	34	44	25	21
No of cases live	172	203	185	168	162	139	143	115	115	87	94	109
No of cases 'On hold'								13	14	18	14	20
2021												
Declarations received	189	93	68	30	25	41	15	12	8	3	7	26
No of cases live	416	373	350	316	289	269	231	226	178	175	174	169

75. During 2022 the Enforcement Team has determined **303** declarations. Of those 78.5% of determinations were made by an investigator (delegated) and 21.5% by the PCP.

76. The number of live cases is now running at a historic low, reflecting the efforts made by the members of the Enforcement Team. Recent declarations are being determined quicker and the focus remains on addressing those historic declarations related to misconduct matters.

77. At present the oldest case requiring PCP determination is 'on hold' at **110 weeks** but this is due to an ongoing SRA investigation and CRL's parallel misconduct investigation is on hold for the same reason.

78. The oldest case requiring delegated decision is **156 weeks**. This related to a previously on hold matter and is now being actioned by CRL.
79. Of the 109 open cases, currently 43 can be determined by an investigator. The remaining 66 may require a PCP decision.
80. The process for the initial assessment of complaints (triage) has now been extended to prior conduct cases to ensure that conduct declarations are allocated to appropriate members of the Enforcement Team. This will aid prioritisation and the prompt resolution of these declarations.

Misconduct

Complaints received

Misconduct Complaints												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022												
No of New Complaints	3	4	5	11	5	8	3	10	8	10	3	3
No of Complaints resolved	1	4	3	13	4	4	2	1	2	12	9	2
No of cases live	112	112	114	112	113	117	118	127	133	131	125	126
No of cases 'On hold'							33	34	37	41	35	36
2021												
No of New Complaints	5	2	7	5	4	3	9	2	5	5	8	3
No of cases live	86	89	95	97	95	98	102	104	108	111	114	110

Cases that are 'On Hold' are where other investigations have priority and so cannot be progressed.

81. The total number of live misconduct cases on 31 December 2022 was **126** which can be broken down as follows:

Authorised Entities	5 (concerning 2 firms)	4.0%
Fellows	65 (one Fellow is subject to 3 separate complaints)	51.6%
Non-Authorised grades	56 (5 members are subject to multiple complaints)	44.4%

82. Of the 126 live misconduct cases, 36 are on hold, of which 35 are subject to investigation by another regulator.

83. The oldest live case, which is on hold, is **207 weeks**. The following table provides an analysis of live complaints by age:

	0-6 months	6-12 months	12-18 months	18-24 months	24+ months
No of live cases	25	27	16	12	46
Those 'On Hold'	4	12	4	1	15

84. Whilst there has been an increase on the number of live cases in 2022, this reflects the increase in the number of complaints received, and, that the time taken to bring complaints to a conclusion now takes longer. In addition, 2022 has seen more complainants request for a review of an investigator's decision, which means that a complaint remains live for longer.

Initial Assessment of Complaint (Target 100% by month end)												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2022	93.6	82.3	86	89.4	100	100	100	100	100	100	100	66.7

85. The initial assessment measure for December fell below 100%. This relates to one complaint being overlooked. Once identified, the complaint was immediately reviewed in early January, and a decision made.
86. CRL will start to use the risk matrices data now available as part of these triage processes in 2023.

Principles breached:

Principles breached	2020	2021	2022
Principle 1 – Rule of Law	7	7	3
Principle 2 – Professional Conduct	55	51	36
Principle 3 – Honesty and Integrity	36	31	17
Principle 4 – Legal Obligations	10	7	8
Principle 5 – Act Competently	12	9	7
Principle 6 – Treat Everyone Fairly	7	4	4
Principle 7 – Ensure Independence	3	1	2
Principle 8 – Act Effectively	2	0	1
Principle 9 – Protect Client Money	0	1	0
Total breaches	132	111	78

87. When a complaint is received, the Enforcement Team assesses the member's alleged misconduct against the Code of Conduct and identifies which Principles may have been breached. The above table shows how the Team has assessed which principles have been breached over the last three years. A member may have broken more than one Principle.

Disciplinary Panels

Professional Conduct Panel (PCP)



88. CRL has scheduled 10 PCP meetings for 2023.

Disciplinary Tribunal (DT)

89. These are scheduled as required.

Appeals Panel

90. There is one appeal hearing scheduled for 9 March 2023.

Recommendation

91. The Board is asked to **NOTE** the report.