



The purpose of this summary sheet is to provide a high level and accessible overview of the Legal Services Board's ("the LSB") decision. Readers are recommended to read the formal decision notice below for further detail. **This summary is not and should not be taken as a formal part of the LSB's decision notice under the Legal Services Act 2007 ("the Act").**

In 2013 the LSB approved an application from the SRA for approval of its Quality Assurance Scheme for Advocates (Criminal) Regulations 2013 (the "QASA Regulations 2013"). These regulations would have introduced a scheme to assure criminal advocacy standards.

For a combination of reasons - including judicial review proceedings, emerging government policy and modernisation of its own regulatory approach - the SRA had never implemented the regulations. As a result, it applied to the LSB to remove them from its regulatory arrangements. Its application explains the reasons in more detail and identifies the alternative work that it is progressing to address the underlying issues that the scheme was intended to remedy.

The LSB's decision is to grant in full the application from the Solicitors Regulation Authority (SRA) for revocation of the QASA Regulations 2013.

Decision notice

The Solicitors Regulation Authority (SRA) rule change application for approval of alterations to regulatory arrangements to remove its Quality Assurance for Advocates (Crime) Regulations 2013 (the “QASA Regulations 2013”)

1. The Legal Services Board (“**LSB**”) has granted an application from the Solicitors Regulation Authority (“**SRA**”) for alterations to regulatory arrangements to revoke the QASA Regulations 2013.
2. This decision notice sets out the decision taken, including a brief description of the changes.
3. The LSB is required by Part 3 of Schedule 4 to the Legal Services Act 2007 (“the **Act**”) to review and grant or refuse applications by approved regulators to make alterations to their regulatory arrangements. The Law Society is an approved regulator and the SRA is the regulatory arm to which the Law Society has delegated its regulatory functions. The notes at page six of this notice explain the statutory basis for the decision.
4. The chronology for the LSB’s handling of this application is also set out below.

Chronology

- The LSB confirmed receipt of an application from the SRA on 30 August 2019.
- The 28 day initial decision period for considering the application ends on 26 September 2019.
- This decision notice is effective from 26 September 2019.
- The decision notice will be published on the LSB’s website by 28 September 2019.

Background

5. The Quality Assurance Scheme for Advocates (“**QASA**”) was developed in response to recommendations arising from a review into the procurement of legal aid by Lord Carter in 2006. That report highlighted concerns about standards of criminal advocacy and suggested that arrangements for assuring the quality of criminal advocates should be introduced. In 2009, the three primary regulators of criminal advocacy – the SRA, the Bar Standards Board (“**BSB**”) and CILEx Regulation, established the Joint Advocacy Group (“**JAG**”) to take on responsibility for developing a quality assurance scheme for criminal advocates.
6. QASA and the associated regulatory arrangements were the output of proposals jointly developed by the JAG. QASA was designed to ensure that, through comprehensive assurance of criminal advocacy standards, the public could continue to have confidence in the competence of representation in the criminal courts. The

QASA regulatory arrangements of all the regulatory bodies that were members of the JAG were approved by the LSB in July 2013¹.

7. Following the LSB's approval of the scheme, judicial review proceedings were brought and a stay was put upon the scheme until 2015, when the Supreme Court dismissed the judicial review application. Shortly after this, the Ministry of Justice published a consultation that proposed development of a separate quality assurance scheme for publicly funded advocates². The JAG members agreed to stay implementation of QASA until the MoJ's position became clear, as it represented a risk to delivery of the scheme. However, the consultation was not brought to a conclusion and QASA has not been implemented by any of the regulatory bodies that were members of the JAG.
8. In August 2018 the LSB approved an application from the BSB to remove the rules from its Handbook, reflecting the fact that it no longer intended to implement the scheme.
9. During the period from 2013 (when QASA was approved) to present, the SRA has undertaken a significant programme of modernisation, bringing its approach more into line with the LSB's expectations of fit for purpose modern regulators, as set out in our Regulatory Performance Framework.

Proposed changes

10. In March 2019, the SRA Board took the decision to revoke its QASA regulations and not proceed with implementation of the scheme. The application explains that this decision was based on the view that the scheme is no longer consistent with its evidence-based and targeted approach to regulation, which it has developed through its modernisation programme. It also notes that it does not consider that it would be appropriate or practicable to implement the scheme independently, given that the BSB has already had its QASA rules revoked.
11. The application seeks approval for the SRA to revoke the SRA Quality Assurance Scheme for Advocates (Crime) Regulations 2013.

Scope of Decision

12. The LSB issued a decision notice in July 2013 in response to a joint application from the BSB, the SRA and CILEx Regulation for the introduction of the QASA scheme. The LSB decision notice approved the QASA scheme and consequential amendments to each of the applicant's arrangements separately. This decision relates solely to the SRA request for removal of its QASA regulations.

¹ The LSB's decision notice that approved the SRA's QASA Regulations 2013 is here:
https://www.legalservicesboard.org.uk/what_we_do/regulation/pdf/26072013_decision_notice_final.pdf

² <https://consult.justice.gov.uk/digital-communications/enhancing-the-quality-of-criminal-advocacy/>

Key issues

Ensuring adequate alternative arrangements

13. QASA was a significant policy development when it was approved in 2013. However, the LSB recognises that legal services regulation has moved on significantly since 2013 and that the scheme needs to be viewed in this light.
14. In assessing this application, we assessed the SRA's justifications for moving away from QASA and considered whether it was pursuing adequate alternative arrangements to respond to the issues that QASA was intended to address.
15. Six years on from approval of the scheme, the SRA now considers that the QASA scheme is not a targeted or proportionate regulatory tool to address concerns about the standard of criminal advocacy. It does not consider that it is consistent with its current regulatory approach. Further, it notes that there is a lack of robust and reliable evidence as to the exact nature and scale of any issues regarding the standard of criminal advocacy provided by solicitors. Of particular relevance in this regard, the SRA jointly commissioned a judicial perceptions study with the BSB in 2018³, which suggested that judges view standards as generally adequate, with pockets of poor practice.
16. Whilst the SRA does not believe that the evidence justifies a blanket scheme being imposed on all solicitors undertaking criminal advocacy, it does recognise that there are underlying issues that require a regulatory response. In the light of the above, the SRA's application explains the measures that it is currently developing in response to these underlying issues. In August 2019 it launched a public consultation on assuring advocacy standards, in which it outlines the evidence that it has on competence concerns relating to criminal advocacy and outlines the following proposals to address these:
 - Revising its requirements for higher rights advocacy⁴, to include, among other proposals, a greater focus on witness handling and dealing with vulnerable clients, and a requirement for solicitors handling certain cases in the Youth Courts to have completed the Higher Rights Assessment
 - Providing enhanced guidance, online tools and data to help solicitors to meet the SRA's standards
 - Establishment of measures to support increased reporting to the SRA of competency concerns, for example from judges or individual consumers. One of the aims of this is to develop a more robust evidence base from which to target future action.

³ <https://www.sra.org.uk/globalassets/documents/sra/research/criminal-advocacy.pdf?version=4a1abf>

⁴ On admission, solicitors automatically gain rights of audience in Magistrates Courts. They need to pass a higher rights assessment in order to be able to exercise rights of audience in the Crown Court or above.

17. Since it became clear that the SRA did not intend to implement QASA, the LSB has been monitoring the SRA's plans in this area under our regulatory performance framework, specifically in relation to the following outcome:

S3: The regulated community are monitored to provide assurance that standards are met. If they are not, steps are taken to remedy this.

18. In our last regulatory performance assessment from June 2019, prior to publication of the SRA's current consultation on assuring advocacy standards, we assessed this outcome as *Not Met – action being taken*, as it remained unclear how it intended to implement changes flowing from its advocacy review programme. Our next scheduled assessment will be in November 2019.
19. In addition to our regulatory performance work, the LSB is currently pursuing a policy objective aimed at ensuring that all regulators have appropriate frameworks for continuing assurance of professional competence throughout the careers of people that they regulate. We will be working closely with the SRA as we develop our evidence base and proposals in this area over the coming year.
20. For the purposes of assessing this application, we are satisfied that the SRA is pursuing arrangements that respond to the issues it identified when developing QASA. Through our future regulatory performance assessments and work on ongoing competence, we will continue to hold the SRA to account to ensure that it is responding effectively and appropriately to any evidence of risks to competence in relation to criminal advocacy and other areas of work.

Decision

21. The LSB has considered the SRA's application against the refusal criteria in paragraph 25(3) of Schedule 4 to the Act. It considers that there is no reason to refuse this application and accordingly, the application is granted.
22. **Annex A** of this decision notice contains a copy of the QASA Regulations 2013 which have been revoked, following approval of this application by the LSB.

Matthew Hill, Chief Executive

Acting under delegated authority granted by the Board of the Legal Services Board

Notes:

1. The LSB is required by Part 3 of Schedule 4 to the Act to review and grant or refuse applications by approved regulators to make alterations to their regulatory arrangements.
2. Paragraph 25(3) of Schedule 4 to the Act explains that the LSB may refuse an application setting out a proposed change to the regulatory arrangements only if it is satisfied that:
 - (a) granting the application would be prejudicial to the regulatory objectives
 - (b) granting the application would be contrary to any provision made by or by virtue of the Act or any other enactment or would result in any of the designation requirements ceasing to be satisfied in relation to the approved regulator
 - (c) granting the application would be contrary to the public interest
 - (d) the alteration would enable the approved regulator to authorise persons to carry on activities which are reserved legal activities in relation to which it is not a relevant approved regulator
 - (e) the alteration would enable the approved regulator to license persons under Part 5 [of the Act] to carry on activities which are reserved legal activities in relation to which it is not a licensing authority, or
 - (f) the alteration has been or is likely to be made otherwise than in accordance with the procedures (whether statutory or otherwise) which apply in relation to the making of the alteration.
3. The designation requirements referred to in paragraph 2(b) above are set out in paragraph 25(4) of Schedule 4 to the Act and are:
 - (a) a requirement that the approved regulator has appropriate internal governance arrangements in place
 - (b) a requirement that the applicant is competent, and has sufficient resources to perform the role of approved regulator in relation to the reserved legal activities in respect of which it is designated, and
 - (c) the requirements set out in paragraphs 13(2)(c) to (e) of Schedule 4, namely that the regulatory arrangements are appropriate, comply with the requirements in respect of resolution of regulatory conflict (imposed by sections 52 and 54 of the Act) and comply with the requirements in relation to the handling of complaints (imposed by sections 112 and 145 of the Act).
4. In accordance with paragraphs 20(1) and 23(3) of Schedule 4 to the Act, the LSB has made rules⁵ about the manner and form in which applications to alter regulatory arrangements must be made. Amongst other things, the rules highlight the applicant's obligations under section 28 of the Act to have regard to the Better Regulation Principles. They also require applicants to provide information about each proposed change and details of the consultation undertaken.
5. If the LSB is not satisfied that one or more of the criteria for refusal are met, then it must approve the application in whole, or the parts of it that can be approved.

⁵ LSB's Rules for applications to alter regulatory arrangements – Version 2 April 2018
[https://www.legalservicesboard.org.uk/what_we_do/regulation/pdf/New%20folder%20\(2\)/FINAL_Rules_for_applications_to_alter_regulatory_arrangements.pdf](https://www.legalservicesboard.org.uk/what_we_do/regulation/pdf/New%20folder%20(2)/FINAL_Rules_for_applications_to_alter_regulatory_arrangements.pdf)

Annex A

SRA Quality Assurance Scheme for Advocates (Crime) Regulations 2013

Introduction to the Quality Assurance Scheme for Advocates (Crime) Regulations

Preamble

Authority: Made on 26 July 2013 by the Solicitors Regulation Authority Board under sections 2, 79 and 80 of the Solicitors Act 1974 with the approval of the Legal Services Board under paragraph 19 of Schedule 4 to the Legal Services Act 2007

Date: These regulations came into force on 30 September 2013

Replacing: SRA Quality Assurance Scheme for Advocates (Crime) Notification Regulations 2012

Regulating: The practice of criminal advocacy in England and Wales

Overview

Outcomes-focused regulation concentrates on providing positive outcomes which when achieved will benefit and protect *clients* and the public. These regulations aim to ensure that *solicitors* and *REs* who want to conduct *criminal advocacy* in England and Wales are competent to do so.

Advocacy is part of an effective justice system. *Solicitors* and *REs* are granted rights of audience in all courts upon qualification/registration but must, in those proceedings which fall under the definition of *criminal advocacy*, exercise those rights of audience only where accredited by the *SRA* under these regulations.

The *QASA*, to which these regulations give effect so far as *solicitors* and *REs* are concerned, is designed so that all advocates in the criminal courts have undergone a process of *accreditation* to ensure they are only dealing with cases within their competence and that they are subject to assessment and independent monitoring of their performance against agreed criteria.

The intention is to give the public confidence that those conducting criminal advocacy have met appropriate standards and adhere to the relevant *Principles*.

The Principles

These regulations form part of the Handbook, in which the 10 mandatory *Principles* are all-pervasive. They apply to all those *we* regulate and underpin all aspects of practice. Outcomes relevant to these regulations are listed beneath the *Principles*.

You must:

1. uphold the rule of law and the proper administration of justice;
2. act with integrity;
3. not allow **your** independence to be compromised;
4. act in the best interests of each **client**;
5. provide a proper standard of service to **your clients**;
6. behave in a way that maintains the trust the public places in **you** and in the provision of legal services;
7. comply with **your** legal and regulatory obligations and deal with **your** regulators and ombudsmen in an open, timely and co-operative manner;
8. run **your** business or carry out **your** role in the business effectively and in accordance with proper governance and sound financial and risk management principles;
9. run **your** business or carry out **your** role in the business in a way that encourages equality of opportunity and respect for diversity; and
10. protect **client money** and **assets**.

Outcomes

The outcomes which apply to these regulations are that:

- O(QS1) **you** have achieved the standard of competence required of advocates conducting **criminal advocacy**;
- O(QS2) **you** demonstrate this competence through independent assessment;
- O(QS3) **you** act so that **clients**, the judiciary and the wider public, have confidence that this has been demonstrated.

Part 1: Interpretation

Regulation 1: Interpretation and definitions

- 1.1 The SRA Handbook Glossary 2012 shall apply and, unless the context otherwise requires:
- (a) all italicised terms shall be defined; and
 - (b) all terms shall be interpreted,
- in accordance with the **Glossary**.

Part 2: Quality Assurance Scheme For Advocates (Crime) (“QASA”)

Regulation 2: Scope of scheme

- 2.1 *You* may not undertake *criminal advocacy* unless *accredited* to do so in accordance with these regulations and the *QASA*.
- 2.2 *You* may be *accredited* under these regulations at a level ranging from 1 to 4 corresponding to the increasing seriousness and complexity of criminal cases falling within those levels as set out in the *QASA*.
- 2.3 *You* may only accept instructions to conduct *criminal advocacy* where *you* are satisfied they fall within or below the level at which *you* are *accredited*, unless *you* are satisfied that *you* are competent to accept instructions for a case at a higher level in light of the particular circumstances and in accordance with the guidance in the *QASA*.

Regulation 3: Accreditation requirement

- 3.1 *You* may only be *accredited* under these regulations if *you* are a *solicitor* holding a current practising certificate or an *REL*.
- 3.2 *You* may only be *accredited* under these regulations at levels 2, 3 or 4 if *you* have obtained the *higher courts advocacy qualification* for *criminal advocacy*.

Regulation 4: General provisions relating to applications made under these regulations

- 4.1 *You* may register, make an application or give a notification under these regulations by:
 - (a) completing the *prescribed* form;
 - (b) submitting such information as may be *prescribed*; and
 - (c) paying the *prescribed* fee, if any.
- 4.2 On receipt of an application under these regulations the *SRA* shall decide whether to grant or refuse the application, and shall notify *you* accordingly giving reasons for any decision to refuse the application.
- 4.3 Before reaching a decision on an application, the *SRA* may:
 - (a) require *you* to undertake such other steps as the *SRA* may specify in order for *you* to be accredited at one of the levels under the *QASA*.
 - (b) require from *you* or a third party, such additional information, documents or references as it considers appropriate.

Part 3: Accreditation for current practitioners

Regulation 5: Application of Part 3

- 5.1 Part 3 of these regulations applies to you if you were admitted as a *solicitor* or became an *REL* before 1 September 2015 .

Regulation 6: Accreditation at level 1

- 6.1 *You* may register with the *SRA* to conduct *criminal advocacy* at level 1 by submitting an application in the manner prescribed by the *SRA*.
- 6.2 After *you* have registered with the *SRA* under regulation 6.1, *you* will be granted *full accreditation* at level 1.

Regulation 7: Registration and Provisional accreditation at level 2, 3 or 4

- 7.1 *You* may register to conduct criminal advocacy at levels 2, 3 or 4 by submitting an application in the manner *prescribed* by the *SRA*.
- 7.2 After *you* have registered with the *SRA* under regulation 7.1, *you* will be granted *provisional accreditation* at *your* chosen level.
- 7.3 Subject to regulation 8.2 below, if *you* have been granted *provisional accreditation* at level 2, 3 or 4 *you* must apply to the *SRA* for *full accreditation* at *your* chosen level within 24 months of the date *you* were granted *provisional accreditation*.
- 7.4 If *you* do not apply for *full accreditation* or for an extension of time under regulation 18 within 24 months of the date *you* were granted *provisional accreditation*, *you* will not be *accredited* under these regulations.

Regulation 8: Full accreditation at level 2

- 8.1 Subject to regulation 8.2, if *you* do not intend to undertake trials, *you* may apply for *full accreditation* at level 2 by submitting an application in the manner *prescribed* by the *SRA*.

Guidance note:

- (i) A list of approved assessment organisations is available via *our* website — www.sra.org.uk. The assessment shall be in the form approved by *us* for the purpose.
- 8.2 If *you* do not intend to undertake trials and *you* have obtained *your higher courts advocacy qualification* for *criminal advocacy* by assessment in accordance with the *SRA Higher Rights of Audience Regulations*, *you* will automatically be granted *full accreditation* and will not be required to apply for *re-accreditation* until such time as is *prescribed* by the *SRA*.
- 8.3 If *you* intend to undertake trials *you* may apply for *full accreditation* at level 2 by submitting:

- (a) an application in the manner *prescribed* by the *SRA*; and
- (b) the prescribed number of *CAEFs* obtained in the *prescribed* manner in accordance with the *QASA* demonstrating that *you* have met the level 2 competencies set out in the *QASA* in level 2 trials.

Regulation 9: Full accreditation at Levels 3 and 4

9.1 *You* may apply for *full accreditation* at levels 3 or 4 by submitting:

- (a) an application in the manner *prescribed* by the *SRA*;
- (b) the *prescribed* number of *CAEFs* obtained in the *prescribed* manner in accordance with the *QASA* demonstrating that *you* have met the required competencies set out in the *QASA* in trials at that level.

Regulation 10: Level 2 advocates intending to undertake trials

10.1 If *you* are *provisionally accredited* in accordance with regulation 7 or *fully accredited* in accordance with regulation 8.1 or 8.2 at level 2 and intend to undertake trials, *you* must:

- (a) notify the *SRA* of *your* intention to undertake level 2 trial work in the manner *prescribed* by the *SRA*; and
- (b) within 24 months of the *SRA* accepting such notification submit the prescribed number of *CAEFs* obtained in the *prescribed* manner in accordance with the *QASA* demonstrating that *you* have met the level 2 competencies set out in the *QASA* in level 2 trials.

Regulation 11: Progression to level 3 or 4

11.1 If *you* are *fully accredited* in accordance with regulation 8.3 at level 2 or are *fully accredited* at level 3, and in either case *you* intend to progress to the level above, *you* must:

- (a) notify the *SRA* of *your* intention to progress in the manner prescribed by the *SRA*; and
- (b) within 12 months of the *SRA* accepting such notification submit the *prescribed* number of *CAEFs* obtained in the *prescribed* manner in accordance with the *QASA* demonstrating that *you* have met the required competencies set out in the *QASA* in trials at the level at which *you* are *fully accredited*.

11.2 After *you* have complied with the requirements of regulation 11.1 above, *you* may be *provisionally accredited* at the next level and *you* may apply for *full accreditation* under regulation 9 above within 12 months of the date *you* were granted *provisional accreditation*.

- 11.3 If **you** do not apply for **full accreditation** or for an extension of time under regulation 18 within 12 months of the date **you** were granted **provisional accreditation**, **you** will revert to the level at which **you** were **fully accredited**.

Part 4: Accreditation for new practitioners

Regulation 12: Application of Part 4

- 12.1 Part 4 of these regulations applies to **you** if **you** were admitted as a **solicitor** or became an **REL** after 1 September 2015.

Regulation 13: Accreditation at level 1

- 13.1 When **you** are either issued with **your** first practising certificate or become an **REL**, **you** will be granted **full accreditation** at level 1 subject to registration in the manner **prescribed** by the **SRA**.

Regulation 14: Accreditation at level 2

- 14.1 If **you** obtain the **higher courts advocacy qualification** for **criminal advocacy** by assessment, **you** will be granted **full accreditation** at level 2 subject to registration in the manner **prescribed** by the **SRA**.
- 14.2 If **you** intend to undertake trials at level 2, **you** must comply with regulation 10 above.

Regulation 15: Progression to level 3 or 4

- 15.1 If **you** are **fully accredited** in accordance with regulation 10 at level 2 or are **fully accredited** at level 3, and in either case **you** intend to progress to the level above, **you** must comply with regulation 11 above.

Part 5: Practitioners returning to QASA

Regulation 16: Procedure for returning to QASA

- 16.1 If **your accreditation** has lapsed, **you** may apply to re-enter **QASA** by complying with the procedures set out in Part 3 of these regulations.
- 16.2 If **your accreditation** has lapsed and **you** are applying for **accreditation** at level 1, **you** must submit evidence of assessed learning and development in the field of **criminal advocacy** in the period since **you** were first accredited at level 1 or since **your** most recent **re-accreditation**.

Guidance note:

- (i) **You** may tell **us** that **you** no longer wish to conduct **criminal advocacy**, in which case **you** should write to notify **us** and **we** will stop corresponding with **you** about **accreditation** or **re-accreditation**.

Part 6: Re-accreditation, special circumstances and appeals

Regulation 17: Re-accreditation

- 17.1 Subject to regulation 8.2 above, if *you* are *accredited* to conduct *criminal advocacy*, then *you* must apply for *re-accreditation* at *your* current level in the manner *prescribed* by the *SRA* within five years of the date *you* were first *accredited* or *your* most recent *re-accreditation* at that level.
- 17.2 The *SRA* may where it thinks appropriate ask *you* to apply for *re-accreditation* within a different period to that specified in regulation 17.1 above and *you* must comply with such a request.
- 17.3 *You* must supply appropriate evidence to support *your* application for *re-accreditation* demonstrating *your* competence to conduct *criminal advocacy* in accordance with the *QASA*.
- 17.4 If *you* fail to apply for *re-accreditation* within the period required by the *SRA* and have not been granted an extension of the period under regulation 18, *your accreditation* at *your* current level will lapse.
- 17.5 If *you* do not satisfy the requirements for *re-accreditation*, *your accreditation* at *your* current level will lapse and *you* will be *provisionally accredited* at the level below.

Regulation 18: Special circumstances

- 18.1 *You* may, on application to the *SRA*, apply for an extension of the period for *accreditation* or *re-accreditation*, which the *SRA* may grant. An extension of the period for *accreditation* or *re-accreditation* may be granted on such terms as the *SRA* sees fit.
- 18.2 *You* may, on providing the *SRA* with adequate reasons, apply for an independent assessment of *your* competence to conduct *criminal advocacy* at levels 2, 3 or 4 and submit such an assessment in place of one or more *CAEFs*.
- 18.3 An application under regulation 18.1 for an extension of the period for *accreditation* or *re-accreditation* must be made before the expiry of the date by which the relevant application for *accreditation* or *re-accreditation* must be made.

Regulation 19: Additional measures

- 19.1 The *SRA* may receive at any point during the currency of *your accreditation CAEFs* which raise a concern about *your* competence to conduct *criminal advocacy*. Where the *SRA* receives any such concern, either because *you* have provided such information or otherwise, the *SRA* may do one or more of the following:
- (a) appoint an independent assessor to conduct an assessment of *your criminal advocacy*;

- (b) require **you** to take specific steps;
- (c) revoke **your accreditation** at **your** current level; or
- (d) where such concerns amount to a breach of the **Principles**, refer **you** for consideration of disciplinary action.

Guidance note:

- (i) **We** will inform **you** and provide **our** reasons for taking action in any case where regulation 19 is relied upon.

- 19.2 Where **you** have applied for **accreditation** or **re-accreditation** at level 1 and **your** application has been refused, **you** will not be entitled to accept any instructions to conduct **criminal advocacy** and the **SRA** may recommend **you** to take specific steps in accordance with regulation 19.1 before **you** reapply for **accreditation** or **re-accreditation** as appropriate.
- 19.3 Where the **SRA** has required **you** to take specific steps under regulation 19.1(b), the **SRA** shall assess the outcome of that action before deciding upon any pending application or further application that **you** may have submitted or any further action that the **SRA** intends to take.

Regulation 20: Appeals against decisions

- 20.1 **You** may within 28 days of receiving notification of the **SRA's** decision appeal against that decision.
- 20.2 **You** may not appeal to the **SRA** against a decision by an assessment organisation where you have failed an assessment.
- 20.3 **You** may not appeal to the **SRA** against an evaluation by an external assessor or a Judge.

Part 7: Repeal, commencement and transitional provisions

Regulation 21: Repeal, commencement and transitional provisions

- 21.1 The **SRA Quality Assurance Scheme for Advocates (Crime) Notification Regulations** shall cease to have effect on 30 September 2013.
- 21.2 These regulations come into force on 30 September 2013 but shall be implemented in phases in accordance with a timetable **prescribed** by the **SRA**.
- 21.3 Subject to regulation 21.4, **you** must register under Part 3 of these regulations in accordance with the timetable **prescribed** by the **SRA**.
- 21.4 After the relevant date in the timetable **prescribed** by the **SRA**, **you** must be **accredited** in accordance with these regulations before **you** undertake any **criminal advocacy**.