

Pupillage (funded, unfunded and mini) and Junior Recruitment Policy

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Chambers

1. Chambers specialises in Chancery and related commercial work and has a particularly strong reputation in the areas of private client, Court of Protection, partnership, commercial and property litigation.
2. There is a relaxed and friendly working environment in Chambers. We hope that any pupil at Ten Old Square will enjoy their time with Chambers whilst learning everything necessary for a career at the Chancery Bar. Chambers considers pupillage to be a learning experience for the pupil and not a twelve month interview.

Equality and diversity, the principles in the Authorisation Framework and dignity

3. Chambers selects pupils, tenants, mini-pupils and employees solely on merit. The race, colour, ethnic or national origin, nationality, citizenship, gender, gender reassignment, gender identity, sexual orientation, political persuasion, marital or civil partnership status, pregnancy or maternity, disability, age or religion of any applicant is disregarded. Chambers welcomes applications from all interested candidates, whatever their status or background.
4. Chambers has an Equality and Diversity Policy which applies to pupillage and recruitment. It is available on Chambers' website. Pupillage applications and the recruitment process will be monitored by Chambers' Equality and Diversity Officers to ensure that the Equality and Diversity Policy is being applied appropriately. Information provided in an equality and diversity form will not be seen by those conducting the recruitment process during the recruitment process.
5. In addition, this policy has been drafted with the principles of:
 - a. Flexibility, Accessibility, Affordability and High Standards, embodied in the Bar Standards Board's Authorisation Framework; and
 - b. dignity, courtesy and respect for others;in mind.

The pupillage committee

6. Pupillage recruitment, pupillage itself and recruitment of starter tenants is managed by the Pupillage Committee.
7. Where possible, the Pupillage Committee will be made up of a diverse cross-section of Chambers' members. The current Head of Pupillage is Richard Dew and the Pupillage Secretary is Naomi Winston.
8. The Pupillage Committee has the following responsibilities:
 - a. To devise and implement policies and procedures for the administration of all matters concerning pupillage (save for the size of the pupillage award which shall be voted on by Chambers, after a recommendation from the Pupillage Committee). This includes the selection of pupils and the appointment of pupillage supervisors.
 - b. The selection and appointment of pupils on behalf of Chambers.
 - c. Recommending to Chambers whether a funded pupil or a potential starter tenant should be offered tenancy.
9. A Pupillage Committee meeting will be quorate if four members of the Committee take part and the Chair shall, if necessary, have the casting vote. If an urgent decision is required and it is not possible for four members to be in attendance, such a decision will be deemed valid in any event. Where appropriate, a pupillage meeting may be conducted by email and the Pupillage Committee may make its decisions by email vote. The Committee may delegate any decision to a subcommittee of not fewer than 2 members.

Pupillage recruitment

10. Chambers' pupillage recruitment is carried out in accordance with Bar Standard Board's ("BSB's") requirements.
11. One twelve month funded pupillage will be offered, if appropriate, in each pupillage year. Chambers does not guarantee that a pupil will be offered tenancy in any given year, but pupils are selected on the basis that they will be suitable candidates for tenancy and it is Chambers' intention, where appropriate, to offer its pupil a tenancy.
12. Chambers is a member of the Pupillage Gateway (the "Gateway").

Recruitment procedure for funded pupillage

13. Chambers' "Selection Criteria" for pupillage are as follows:
- a. Genuine interest in Chambers' fields of practice.
 - b. Academic ability.
 - c. Analysis and reasoning.
 - d. Knowledge and understanding of the law.
 - e. Written communication skills.
 - f. Oral communication skills.
 - g. Ability to relate to lay and professional clients.
 - h. Resilience, perseverance and a drive to succeed at the Bar in England and Wales.

Applications

14. Applications for funded pupillage must be made through the Gateway in accordance with the Gateway timetable.

Selection of candidates for interview

15. Applications will be anonymised before being considered.
16. Each application will be considered by a panel, made up of the Pupillage Secretary and two other members of Chambers. If, in exceptional circumstances, the Pupillage Secretary is not available, at least one member of the panel will be on the Pupillage Committee. Each application will be marked, according to the Selection Criteria, taking into account the fact that the candidates may be at different stages in their legal education. Each of the Selection Criteria will be marked out of six, save for the 'interest in Chambers' fields of practice' criterion, which will (at the sift stage only) be marked out of three. Those candidates with the highest marks will be invited to a first round interview. Where several candidates have the same or very similar marks, the panel will meet to discuss their applications and will agree which of these candidates to invite to a first round interview. Approximately 30 candidates will be invited to a first round interview.

17. Once the shortlist of candidates has been determined, Chambers will notify the applicants through the Gateway as to whether their application has been rejected or whether they are invited to interview.
18. Candidates invited to interview, who live some distance away from Chambers and who cannot, or cannot comfortably, afford their travel expenses (i.e. are experiencing hardship), may make a request by email to the Pupillage Secretary for payment of, or a contribution to, their reasonable travel expenses within the UK of attending interviews, visiting a library to complete the second round problem or attending the open day. Any requests for return journey which have a cost of £100 or less will be considered by the Pupillage Secretary. Any requests over that threshold will be considered by the Pupillage Committee. All requests will be responded to in a timely manner.

Interviews: general

19. Invitations to interview will identify the times at which interviews will be offered and candidates will be given the opportunity to request a particular time and date subject to availability on a 'first come, first served' basis. Chambers expects that all interviews will be conducted in person but if this is not possible (due to a candidate's availability, ability to travel or because of other circumstances) they will be conducted remotely, preferably using videoconferencing.
20. If there is a good reason why a candidate is unable to attend any part of the recruitment process on the dates initially offered, Chambers will endeavour to accommodate them but can only do so if that candidate gives sufficient notice of any such difficulties.

First round interview

21. The first round interview will be conducted by a panel made up of three members of Chambers, at least one of which will (save in exceptional circumstances) be on the Pupillage Committee.
22. Each interview will last for approximately 20 minutes and will be made up of questions arising from the candidate's application form and discussion of a short legal problem which will be presented to each candidate 15 minutes prior to their interview, provided that the candidate arrives on time. Each member of the panel will independently mark each

candidate's interview in writing, according to the Selection Criteria, taking into account the fact that the candidates may be at different stages in their legal education. Each of the Selection Criteria will be marked out of six. The panel will agree their marks for each candidate.

23. At the end of the first round interviews, the panel members will, in accordance with their marks, draw up a shortlist of approximately eight to ten candidates who will be invited through the Gateway to take part in the second stage of the pupillage recruitment process. The unsuccessful candidates will be informed by email that they will not be invited to take further part in that year's recruitment process.

Second round

24. The short-listed candidates will be sent instructions for a piece of written work. They will usually be given at least five days to complete the piece of written work, including a weekend. The completed written work must reach Chambers by 6:30 pm on the deadline date, which will be set out in the instructions. The completed written work will, save in exceptional circumstances, only be accepted by email.
25. Each piece of written work will first be anonymised before being considered and marked by a member of Chambers nominated by the Pupillage Committee, according to the following criteria:
 - a. Structure and clarity.
 - b. Identification of the issues and further information required.
 - c. Identification of the relevant law.
 - d. Analysis, reasoning and conclusions.
 - e. Practicality.
26. There will then be a second round interview in front of a panel made up of as many members of the Pupillage Committee as are available. The majority of the interview will be spent discussing the written work produced by the candidate but will also include questions arising from the candidate's application form and a debate question, which will be presented to the candidate by one member of the panel during the interview. There will

be an opportunity at the end of the interview for candidates to ask any questions they wish of the panel. Each member of the panel will independently mark each candidate's interview in writing, taking into account the scores achieved for the written work under the procedure in paragraph 25 above. The marking will be according to the Selection Criteria, taking into account the fact that the candidates may be at different stages in their legal education. Each of the Selection Criteria will be marked out of six, save for the 'academic ability' criterion which will be marked out of three. The panel will agree their marks for each candidate.

27. At the end of all of the interviews, the panel members will rank the candidates in accordance with their marks and agree which candidates satisfy the overall requirement for selection. Candidates which satisfy the overall requirement will shortlisted; those who do not satisfy the overall requirement will be informed through the Gateway that they will not be offered pupillage.
28. Circumstances permitting, those candidates on the shortlist will be invited to attend an open day in Chambers during which they will sit with a member of Chambers and have an opportunity to see Chambers' life. The open day itself does not form part of Chambers' assessment of the candidates. If it is not possible to hold an open day, or if a candidate is not able to attend the open day, then Chambers will do its best to find a reasonable substitute in all the circumstances.
29. Chambers will make offers of pupillage through the Gateway to the candidates in the order of the shortlist arrived at by the Pupillage Committee. The process will continue until the pupillage place has been taken or all offers have been made and rejected. Once an offer has been accepted, the remaining candidates on the reserve list will be informed through the Gateway that this is the case.
30. All offers of pupillage will be made on the basis that they remain open for acceptance for a period of at least three days. Offers will be conditional on the candidate, prior to the start of pupillage:
 - a. passing the academic and vocational stages of Bar Training at the first attempt and obtaining at grade of least 'Competent' on the vocational training;

- b. being a member of an Inn;
- c. having a nationality or immigration status which allows you to undertake pupillage throughout the Pupillage;
- d. having registered the pupillage with the BSB;
- e. providing Chambers with clear documentary evidence that they are qualified to start pupillage in accordance with the BSB's requirements;
- f. signing an agreement in the same terms or substantially the same terms as the Agreement (which agreement may be subject to further change in line with any regulatory changes imposed by the BSB or other relevant regulatory body);

although, where permitted by the BSB's regulations, any of these conditions may be waived at the discretion of the Pupillage Committee in exceptional circumstances.

Feedback on the pupillage recruitment process

- 31. Due to the number of applications it receives, Chambers is unable to offer feedback to candidates who are not shortlisted for interview.
- 32. Feedback for those candidates who have progressed to the interview stage will be provided to those candidates who request it. Feedback will be provided within a reasonable time to all candidates who request it, although for candidates who progress to the second round interview stage, it may not be provided until Chambers has completed its recruitment process.
- 33. Chambers welcomes repeat applications from candidates and will mark each new application afresh.

Pupillage funding

- 34. A funded pupillage carries an award of £60,000 for the twelve-month period.
- 35. Up to a quarter of the award may be drawn down during the year preceding the pupillage. The drawdown will usually be paid in instalments which shall not exceed £1,250 in any one calendar month. If a pupil wishes an exception to be made to this rule, they must make a request in writing to the Chambers Management Committee. Any such request will be

treated confidentially. The remaining part of the award (or the entire award, if no draw down is taken), will be paid to the pupil in twelve equal monthly instalments, starting in the month in which they commence pupillage.

36. Any fees which the pupil earns in the practising period of pupillage will not be clawed back and will be paid to the pupil as and when the relevant fee notes are settled by the lay or professional client. No Chambers' expenses or clerk's commission will be charged on fees received during pupillage.
37. Funding for any period of extension of the pupillage beyond twelve months will be dealt with in accordance with paragraph 62 below.
38. Chambers may in its discretion demand repayment of any sums paid prior to or during the pupillage in the event that the pupillage is not commenced or completed for any reason, save that the first £1,595.33 received for each of the months after pupillage has commenced will not be recouped unless there has been misconduct on the part of the pupil, which may include one or more of the events set out in sub-paragraphs 84(a) to (f) below.

Recruitment procedure for unfunded pupillage

39. Chambers will consider applications for unfunded pupillages, lasting for up to twelve months, from applicants. Chambers generally offers these pupillages in order to build connections with other lawyers, often working in different jurisdictions. These unfunded pupillages do not form part of Chambers' recruitment system for tenants and an unfunded pupil will not be considered for tenancy at the end of their pupillage.
40. Applications for unfunded pupillage:
 - a. must be made on Chambers' standard unfunded pupillage application form which can be downloaded directly from the pupillage page of Chambers' website. Alternative formats can be provided, if necessary, to those candidates who require it;
 - b. should, save in exceptional circumstances, have text typed in and be saved in Word or PDF format;

- c. will, save in exceptional circumstances, only be accepted by email sent to pupillage@tenoldsquare.com and headed “Unfunded Pupillage Application”.
41. Each application will be considered by the Unfunded Pupillage Secretary and one other member of the Pupillage Committee (nominated by the Unfunded Pupillage Secretary) who will mark the application, according to the Selection Criteria. The “Resilience, perseverance and a drive to succeed at the Bar in England and Wales” criterion shall be amended so that it applies to the Bar or fused profession in any jurisdiction and the following 9th criterion will be added: “ ongoing benefit to Chambers of a continuing connection with the pupil after they have completed pupillage and left Chambers” (the “Unfunded Selection Criteria). Each of the Unfunded Selection Criteria will be given a mark out of six. If it is considered that the application has merit, it will be passed to the Chair of the Pupillage Committee who will mark the application, according to the Unfunded Selection Criteria. If, after discussion between these three members, it is agreed that the application has merit, the candidate will be invited to an initial interview which will follow the procedure set out at paragraphs 21 and 22 above, save that marking will be in accordance with the Unfunded Selection Criteria.
42. At the end of the first interview, the panel will discuss the candidate according to the Unfunded Selection Criteria and agree whether or not to invite the candidate to complete a piece of written work and to attend a second interview. The candidate will be informed by email of the panel’s decision.
43. If the candidate is asked to continue to take part in the recruitment process, the procedure will follow that set out in paragraphs 24 to 26 above, save that marking will be in accordance with the Unfunded Selection Criteria. At the end of the second interview, the panel will discuss the candidate and agree whether or not to offer the candidate an unfunded pupillage.
44. Any offer of an unfunded pupillage will be subject to Chambers obtaining waivers in relation to the individual pupillage from the BSB in respect of the obligations it imposes to fund and advertise pupilages.

45. If rejected, applicants for unfunded pupillage are entitled to apply for unfunded pupillage again, but should not expect to receive a different response, unless there has been a material change of circumstances since their last application.

Pupillage

Structure and content of pupillage

46. A pupil at Ten Old Square can expect to see a range of Chambers' work. Each pupil will usually sit with four members of Chambers during the pupillage year, each for a three month period, in those members' rooms. It is likely that, throughout their pupillage, pupils also will undertake work for other members of Chambers. The content of the training will be guided by the Pupillage Training Programme, which is available to pupils and supervisors. Pupils will be asked to carry out the same work as their supervisor or the member of Chambers that they are sitting with, which may include research, drafting chronologies, case summaries, opinions, other advice, statements of case, witness statements, skeleton arguments, position statements or non-contentious documents, preparing oral submissions or cross examination and otherwise preparing for hearings, conferences or mediations. Pupils will generally work on 'active' cases but may, where it is thought it will assist their training, work on cases that are no longer active. Where possible, pupils will attend hearings, conferences or mediations with their supervisor or other members of Chambers and will listen to telephone conferences.
47. During the practising period of pupillage there may be opportunities for the pupil to undertake work on their own, sometimes on pro bono basis. Chambers does not guarantee a minimum amount of paid work in the practising period of pupillage and, because the emphasis during pupillage is on training and the pupillage is fully funded, precedence will be given to ensuring that the pupil carries out the work necessary to meet the threshold standard for the competences set out in the BSB's Professional Statement (the "Competences") required for qualification as a barrister and Chambers' criteria for tenancy.
48. In allocating work, the clerks will consider whether paid work would be more suitable for a junior tenant, on the basis of the level of skill and practice required and on the basis that priority will be given to the junior tenants. The clerks will discuss any work they wish to allocate to the pupil with the pupil's supervisor before allocating it. However, work will not

be allocated on the basis of the race, colour, ethnic or national origin, nationality, citizenship, gender, gender reassignment, sexual orientation, political persuasion, marital or civil partnership status, pregnancy or maternity, disability, age or religion.

49. Shortly before pupillage starts, the pupil will be invited into Chambers to meet with the Pupillage Secretary. The candidate will be asked to complete the BSB's application to register a pupillage, will have an opportunity to ask any questions they wish and will, if possible, be introduced to the first pupil supervisor. They will be asked to inform the Pupillage Secretary and/or their first supervisor of any personal circumstances (e.g. a disability or caring responsibilities) that they believe need to be taken into account by Chambers, so that reasonable adjustments can be made to their training. The information provided will be kept confidential to the Pupillage Committee, save where it is necessary to share it with other members of Chambers and/or the clerking team in order to facilitate making any reasonable adjustments. The pupil will be asked if they are content for that information to be shared before it is disclosed.
50. On the first day of pupillage, or as near to it as the pupil supervisor's case load permits, the pupil will be given a general introduction to Chambers, its facilities, members, clerks and staff, by the supervisor and the supervisor will provide a formal induction, as required by the Bar Qualification Manual ("BQM"), section C8, para 1.2. Induction documentation will be provided to all pupils during their first week.

Role and responsibilities of pupils

51. During pupillage, in addition to complying with the relevant responsibilities of pupils set out in the BQM, section C3, para 3.4, a pupil must:
- a. be conscientious and apply themselves full time to the pupillage;
 - b. follow the instructions and guidance of their pupil supervisor, which may include reading papers, research, drafting, attending conferences, mediations and hearings and/or taking a note;
 - c. act in good faith in the best interests of Chambers as a whole and of its members;

- d. not give advice to the clients of any member of Chambers or contribute during any meeting with a lay or professional client or at court (or other tribunal), unless expressly invited to do so by their supervisor or the member whom they accompany;
- e. act appropriately on feedback provided by the pupil supervisor and in relation to assessment and appraisal of their work, and complete any remedial or additional work that is required by Chambers or the BSB;
- f. read section C of the BQM issued by the BSB;
- g. keep a diary of work done in order to assist in demonstrating that the Competences have been met;
- h. in aid of preserving the confidentiality of every client's affairs, including clients of the supervisor and other barristers with whom they work:
 - i. sign a confidentiality form on commencement of pupillage;
 - ii. not take papers or books belonging to other members of Chambers out of Chambers without prior permission of the relevant member;
 - iii. keep all papers secure and not leave them unattended in public places;
- i. not publish any Chambers, law or pupillage related commentary or posts (whether in print, on social media or otherwise) without the consent of their pupil supervisor;
- j. before their practising period of pupillage, read and consider the BSB Handbook, any other relevant regulatory requirements that will apply to them during pupillage and on commencing full practice, and Chambers Equality and Diversity Policy and raise any issues of which they are uncertain with their supervisor;
- k. in their practising period of pupillage, contact any non-attending solicitor who has instructed the pupil after a court hearing in order to inform them of the outcome of the hearing and ensure that any future court dates are communicated to the clerks;
- l. wear a suit to attend at court or at other events where lay or professional clients will be present, at all other times (unless told otherwise) wear business casual and keep a suit/shirt in Chambers; and

- m. on request from the Pupillage Committee, provide them with access to their Bar Training Record on MyBar to view the results of any compulsory courses and use all reasonable endeavours to obtain and provide to the Pupillage Committee any feedback received by that Pupil on any compulsory courses and/or examination required by the BSB and/or will consent to the BSB sharing such feedback with the Pupil's registered pupil supervisor.

Pupils are welcome to attend Chambers-wide social and networking events, but are not required to attend and, for the avoidance of doubt, will not form part of their assessment. Where they do attend, they will not be required to make a contribution towards the cost of the event or pay for any food or drink and must not feel obliged to drink alcohol.

Duties of supervisors

- 52. All Chambers' pupil supervisors have had appropriate training and been determined by Chambers to be suitable and competent to act as pupil supervisor. The members of Chambers who are currently registered as supervisors and regularly take pupils are Jeremy Callman, Richard Dew, Georgia Bedworth and James MacDougald.
- 53. Whilst supervising a pupil, in addition to complying with the duties of supervisors set out in the BQM, section C3, para 4, a supervisor should:
 - a. take all reasonable steps to provide the pupil with the necessary tuition, supervision and experience they will need for successful completion of their pupillage;
 - b. where they will be away from Chambers for three or more consecutive days during which the pupil will remain in Chambers, if possible, arrange for another member of Chambers to look after the pupil;
 - c. consider when it is appropriate for the pupil to carry out work for other members of chambers, ensuring that the pupil is not overburdened with work;
 - d. alert the pupil at an early stage of any serious concerns with their performance or conduct once they have become apparent, in order to allow the pupil the opportunity to rectify the concerns;
 - e. so far as is reasonably practicable and appropriate, supervise work conducted by the pupil during the practising period of pupillage; and

- f. inform the pupil about etiquette towards members, clerks, staff, solicitors, other barristers, court staff and clients and encourage good working relationships between the pupils, clerks, staff and members.

Duties of other members of Chambers

- 54. In the event that a member of Chambers would like a pupil to carry out a piece of work or accompany them to court (or other tribunal) or to a mediation, that member must, before discussing the matter with the pupil, obtain the prior permission of the pupil supervisor. Members of Chambers are encouraged to provide feedback on any work carried out for them by a pupil to the pupil and pupil's current supervisor using Chambers' standard 'feedback form' or, if this is not feasible (given work commitments) to at least provide feedback orally to the pupil's current supervisor.
- 55. In the event that a member of Chambers has a concern about a pupil, they should, in the first instance, make the concern known to the pupil supervisor or the Chair of the Pupillage Committee who will have responsibility for addressing that concern.

Assessment, training plans, feedback, appraisal and advocacy exercises

- 56. Pupils are assessed by reference to:
 - a. The Competences, where decisions are being made about satisfactory completion of the first and second periods of pupillage;
 - b. The Selection criteria (as set out at paragraph 13 above), where decisions are being made about tenancy and other relevant matters (as set out at para 91 below).
- 57. At the start of each three month period, a pupil supervisor will draw up a training plan for the pupil setting out what work it is expected that the pupil will see (bearing in mind that the work commitments of the supervisor may change), what it is hoped the pupil will achieve during that period in relation to the Competences and how it will be achieved. Where the pupil has spent time with a previous supervisor and areas requiring improvement or work not yet (or not sufficiently) seen have been identified, this will be taken into account when drafting the next training plan.
- 58. Pupil supervisors will provide regular feedback to and appraisal of their pupils:

- a. Verbal feedback will be given on individual pieces of work, as soon as possible after the work is completed and there will be opportunities given for pupils to raise any difficulties or concerns with their progress, their work, the supervision they are getting or relationships with others in Chambers.
 - b. Written feedback will be given on Chambers' standard 'feedback form', again in a timely manner. Each supervisor will aim to provide at least one feedback form for each different type of work a pupil carries out for that supervisor (e.g. drafting statements of case/opinion/skeleton/non-contentious drafting). If a pupil only does one or two types of work during the three months, the aim will be to produce a minimum of three feedback forms. Pupils will have an opportunity to comment on the feedback, in writing, both on their own performance and on the training they are receiving.
 - c. Three-monthly appraisals will be carried out by the pupil and the supervisor. The pupil will first carry out a self-assessment using Chambers' standard 'appraisal form'. The supervisor will then carry out an appraisal, taking into account feedback from other members of Chambers and/or the clerks, where appropriate. Pupils will have an opportunity to comment on the appraisal, in writing, both on their own performance and on the training they are receiving.
 - d. Each supervisor will pass copies of their training plans, feedback and appraisals for a pupil onto the next supervisor as well as discussing with the next supervisor any areas the pupil has not seen or needs to work on.
59. Chambers will run advocacy exercises for the pupil across the course of the twelve month pupillage in order to prepare them for dealing with the type of applications they are likely to experience early in practice. The timing of the exercises will depend on when the pupil undertakes their Inn-run Advocacy Training Course and on the diaries of those members of Chambers taking part in the exercise. One member of Chambers will sit as a judge and the exercise will be observed by the pupil supervisor and at least one other member of Chambers. Feedback will be provided verbally and on Chambers' standard 'feedback form'. During the pupil's practising period of pupillage, each supervisor will endeavour to observe the pupil's performance in court on at least one occasion.

60. The pupil and supervisor or, where appropriate, another member of Chambers, will work together to address any issues identified in the feedback or appraisals.
61. At the end of each six month period, the supervisor will carry out an assessment of the pupil by reference to the Competences and will notify the BSB whether the pupil meets the Competences. This will take into account the work of the pupil, feedback given to and about the pupil, the pupil's own reflections on their work and any relevant discussions with the pupil.
62. If the pupil does not pass the assessment at the end of the non-practising period of pupillage, the pupillage may be terminated in accordance with paragraph 85 below. If the pupil does not pass the assessment and/or any compulsory courses required by the BSB at the end of the practising period as a result (in the view of the Pupillage Committee) of absence from training due to serious illness, injury, personal crisis or the need for parental leave or because of other extenuating circumstances, the Pupillage Committee may decide (with the pupil's agreement) to continue the pupillage for an appropriate period of time as long as the BSB approves any necessary application for an extension and, where the extension requires the payment of an additional award, the approval of Chambers Management Committee for that payment. The amount of any additional award will be at the discretion of Chambers' Management Committee and may be limited to the minimum pupillage award at the relevant time, pro-rated to the period of the extension.

Working hours, holidays etc.

63. Save in exceptional circumstances, pupillage will start on the first working day in October the year after the offer is made. Chambers does not accept applications for deferred pupillage but may consider deferring the start of a successful applicant's pupillage in exceptional circumstances and subject to the approval of the Pupillage Committee who will take into account, among other things, the effect of deferring pupillage on future starter tenants and pupils.
64. Pupils are expected to work hard during their pupillage. This is seen as essential preparation for full time practice as a barrister. It is important for a pupil's training that they attend a significant portion of their supervisor's conferences, mediations, hearings etc and, where these are held in person, the pupil should generally attend in person as well.

Pupils also benefit from spending time in Chambers with their supervisor, on a day to day basis. Where a pupil and supervisor are going to work from Chambers, the pupil supervisor will specify the time that the pupil should arrive in Chambers and leave each day. This will generally require the pupil to work during Chambers core hours of 9.00 am to 6.00 pm, with a lunch break. However, subject to the demands of their practice and their own family life, each supervisor will be flexible about which days they agree with the pupil they will work in Chambers and pupils will be given time to attend any medical or similar appointments. On days when a pupil is working remotely and on paperwork, pupil supervisors will (subject to any deadlines imposed by third parties) be flexible about the time at which that work is carried out, whilst also taking care to ensure that the pupil does not spend longer working than they would have done if they had carried out the work during standard working hours. There may be instances when a pupil will be asked to work longer hours if, for instance, they are needed to assist on an urgent case. Pupils will be asked to sign a waiver from the Working Time Regulations, although Chambers makes no admission as to the application of the Regulations to pupils.

65. If a pupil is unwell and unable to attend for work, the pupil must notify the pupil supervisor and the clerks as soon as possible and, if the supervisor is unavailable, leave a message for the supervisor with a clerk.
66. If a pupil is unwell and unable to attend for work more than five days, the pupil must obtain a fit note from their GP or treating doctor and provide the same to their current supervisor.
67. If a pupil has more than five days' sick leave in any six month period of pupillage, the Committee will consider whether their pupillage needs to be extended in order that the pupil can meet the Competences. The pupil must also notify the BSB of the new date of completion of pupillage on the Notification of a Material Change in Pupillage Arrangements form.
68. In the event of serious illness, injury, personal crisis or the need for parental leave which prevents a pupil from being able to complete a stage of pupillage within the usual period of time, the Pupillage Committee will consider the appropriate course of action in the circumstances, having regard (where relevant) to Chambers' Parental Leave Policy.

69. Pupils are entitled to twenty days' annual leave during pupillage which will preferably be split evenly between each of the six month periods. This does not include Bank Holidays but does include any period when Chambers may be closed. Any longer period of leave must be sanctioned by the Pupillage Committee and will have to be made up by an equivalent extra period at the end of the relevant part of the pupillage.
70. Holiday dates should be agreed in advance between the pupil and the supervisor with whom the pupil is or will be sitting at the relevant time. In the practising six months, the pupil should also discuss holiday dates with the Senior or Deputy Senior Clerk.

Expenses and equipment

71. It is intended that the level of the pupillage award is sufficient to cover all expenses that a pupil will normally encounter in the course of pupillage.
72. Pupils are expected to pay for their own travel to Chambers, to court in London with their supervisor, other travel within London and whenever travelling on their own account. If a supervisor deems it necessary for the pupil's training to have the pupil accompany them outside London, then the supervisor will:
- a. usually reimburse all reasonable expenses associated with such a trip; but
 - b. where those expenses are substantial, before the trip is made, a supervisor may apply to Chambers' Management Committee, requesting that those expenses be reimbursed by Chambers.
73. Chambers will pay for the costs (if any) of:
- a. a pupil's compulsory advocacy course;
 - b. the first sitting and first resit of a pupil's compulsory professional ethics examination, save a pupil must pay for any second or further resit that is required out of their pupillage award; and
 - c. for pupils commencing pupillage on or after September 2025, a pupil's compulsory negotiation skills course.

74. Pupils are required to provide their own laptop or other computer suitable for use during pupillage (bearing in mind that they will sit with in a number of different rooms during the year). The laptop and any other electronic devices on which the pupil stores confidential client information must be encrypted using encryption software which complies with current data protection law.
75. Pupils will have access to Chambers' management system, telephone network, internet, online library, books, stationery and photocopying and printing facilities for work purposes. Pupils will be provided with a Chambers' email address.

Pastoral care

76. In addition to the pupillage supervisors, Chambers has two nominated the Wellbeing Officers (Naomi Winston and Philip Jenkins) who are available to discuss matters of a pastoral or personal nature, if required. Any discussions with either of them are in strict confidence and are outside Chambers' complaints or grievance process save that a Wellbeing Officer may, with the consent of the pupil or where the matter is sufficiently serious, refer any concerns raised by a pupil to the current pupil supervisor or Sam Laughton, as appropriate.
77. Pupils may at any time communicate with or speak to the Head of Pupillage (Richard Dew), the Head of Chambers (Francis Barlow QC), the Equality and Diversity Officers (Susannah Meadway and Jeremy Callman) or any other member of Chambers. They may initiate this contact themselves or ask their current supervisor to do so.
78. It is hoped that it would be possible to resolve any issues internally. However, pupils should be aware of their right to take any complaint to the BSB. Details of this option are available from the BSB and are set out in the BQM, section C8, para 1.33.
79. Any expression of concern about pupillage or the making of a formal complaint by a pupil will not, unless it is found to have been actuated by malice, be held against the pupil in any way when the tenancy decision is made.

Grievance procedure

80. If concerns arise in relation to discrimination, harassment or related issues, the pupil should use the procedure under Chambers' Equality and Diversity Policy or Anti-Harassment Policy, as appropriate. The pupil has a right to complain.
81. Similarly, a pupil has a right to complain if they have concerns in relation to their training. Such a complaint may be made to any member of the Pupillage Committee and will be reviewed by the members of that Committee, save for the person or persons who that complaint is about.
82. In the event that a pupil wishes to raise a grievance of a different nature, they should in the first instance raise the matter with their pupil supervisor, unless the grievance relates to that supervisor, in which case the pupil should notify Sam Laughton who is nominated to take the lead in the resolution of any complaints. The pupil supervisor or (where relevant) Sam Laughton, shall discuss the complaint with the pupil and where necessary investigate further before either rejecting or upholding the complaint. The pupil will be given a written response on the outcome of the complaint with a clear indication of the action Chambers will take if the complaint is upheld.
83. If the pupil is unhappy at the outcome of their complaint or the manner in which their complaint has been handled or determined then they should raise the matter with the Head of Chambers (or, if unavailable, another senior member nominated by the Head of Chambers to handle the complaint) who shall consider the matter further and take such steps as they consider appropriate.

Disciplinary and termination provisions

84. The following conduct by a pupil may give rise to disciplinary action:
- a. conviction for a criminal offence;
 - b. reasonable belief by the Pupillage Committee of dishonesty;
 - c. failure to comply with this Policy, in particular paragraph 51;
 - d. failure to comply with Chambers' Equality and Diversity and Anti-Harassment Policies;

- e. breach of the BSB Handbook;
 - f. conduct likely to bring Chambers or any of its members into disrepute or to prejudice the interests of Chambers;
 - g. ceasing to hold a valid practising certificate during the practising period of pupillage;
 - h. failure to meet the Competences at the end of the non-practising period of pupillage;
 - i. ceasing to be eligible to undertake or complete the pupillage because of a change of immigration status;
 - j. failure to meet the minimum attendance or other regulatory requirements of the BSB for commencing or completing the non-practising period or practising period of the pupillage;
 - k. having an order made or a deputy appointed in relation to their property and affairs by the Court of Protection under section 16 of the Mental Capacity Act 2005.
85. In the event of the need for disciplinary action and/or where the pupillage may need to be terminated, the procedure will be as follows:
- a. The Pupillage Committee will meet to consider the position and in the light of the gravity of the conduct consider, in particular, whether the matter should be the subject of oral or written warnings or an immediate recommendation to Chambers to terminate the pupil's pupillage.
 - b. The Pupillage Committee may agree to issue an oral warning from the Chair of the Pupillage Committee, or, if more appropriate, a pupil supervisor, setting out the issues that the pupil needs to address. The Chair of the Pupillage Committee or, if appropriate, a pupil supervisor, will go through the issue or issues with the pupil and discuss the most effective ways to address them.
 - c. If the matter warrants an immediate written warning or if an oral warning has been given but the issue or issues are not addressed and resolved by the pupil to the satisfaction of the Pupillage Committee within 14 days of the oral warning or within such other time as thought fit, the Chair of the Pupillage Committee will issue a written warning, setting out the issues that the pupil needs to address. The Chair of

the Pupillage Committee or, if appropriate, a pupil supervisor, will go through the issue or issues with the pupil and discuss the most effective ways to address them.

- d. Oral and written warnings may be appealed by the pupil in writing, within 7 days of being issued, to Chambers' Management Committee by sending an email to Eason Rajah QC.
- e. If following a written warning as set out in the immediately preceding sub-paragraph, the issue or issues are not addressed and resolved by the pupil to the satisfaction of the Pupillage Committee within 14 days of the written warning or within such other time as thought fit, the Pupillage Committee will meet to consider whether a recommendation should be made to Chambers to terminate the pupil's pupillage and the reasons for that recommendation.
- f. If a recommendation to terminate the pupil's pupillage to Chambers under paragraph 85(a) or (d) above is made, the pupil will have a reasonable opportunity to:
 - i. see the recommendation and any other information provided to Chambers by the Pupillage Committee; and
 - ii. to make their own representations to Chambers. Such representations may be made in writing (if provided within a reasonable period) and/or in person. If representations are to be made in person, the pupil may be accompanied by another person and/or may nominate that other person to make the representations on their behalf.
- g. Once the Pupillage Committee's recommendation and the pupil's representations (if any) have been received by Chambers, all available members of Chambers will be invited to vote on whether or not the pupillage should be terminated. The decision will be made by a simple majority. Any termination will take immediate effect.

86. Chambers may also terminate the pupillage if Chambers ceases to be authorised by the BSB as an AETO or there is another regulatory, financial or practical impediment to Chambers continuing to provide the Pupillage.

87. The pupil may terminate the pupillage:

- a. prior to its commencement by giving 4 weeks' written notice to Chambers; and
- b. after its commencement by giving 2 weeks' written notice to Chambers.

Tenancy decision

88. Prior to the making of a tenancy decision, the Pupillage Committee will collate information from the pupil supervisors, from all members of Chambers for whom the pupil carried out work during pupillage and any other information from third parties which is relevant to the Selection Criteria, including any information available from instructing solicitors. They will also review any results received by the pupil for their compulsory courses required by the BSB. They will consider all of this information and the pupil's merits and performance throughout their pupillage in comparison with the Selection Criteria and make a written recommendation to Chambers as to whether or not the pupil should be offered tenancy.

89. The decision as to whether or not to offer a pupil tenancy is made at a Chambers general meeting, after consideration of the Pupillage Committee's recommendation, of information from the Senior Clerk as to the amount of work currently available for junior members of Chambers and expected to be available in the near future and of the views of the current starter tenant, all of which information will be included in a report by the pupillage committee to Chambers. The meeting usually takes place in late June or early July (where pupillage was commenced at the start of the previous October). Members of Chambers will have an opportunity at that meeting to put further questions to the pupil's supervisors and/or the Chair of the Pupillage Committee or to offer further information. Members who are aware that they will be unable to attend the meeting should provide any views they have on the decision and their proxy vote to another member of Chambers. All members voting will have completed appropriate fair recruitment training. The decision will be made by Special Resolution.

90. In deciding whether or not to offer a tenancy to the pupil, Chambers will consider:

- a. the pupil's merits and performance throughout their pupillage, in comparison with the Selection Criteria;
- b. Chambers' resources; and

- c. Chambers' practice needs at the time.

The decision will be taken in accordance with the principles set out at paragraph 3 above.

- 91. A pupil will not be offered Tenancy if they do not meet the threshold standard for the Competences and or if they have failed and cannot resit any of their compulsory courses. If a pupil is awaiting results of one or more compulsory courses or will be taking a resit, a tenancy may be offered conditionally on that or those courses being passed by a specified date or event. Whether a pupil's pupillage will be extended until the condition is met will be determined in accordance with paragraph 62 above. A pupil who is not offered a tenancy or a conditional tenancy will not generally be permitted to remain in Chambers after the completion of their pupillage. However, reasonable efforts will be made to assist such pupils to find a further tenancy, an additional period of pupillage or employment elsewhere.

Applications for a starter tenancy or an additional period of pupillage

- 92. If the pupil is not offered tenancy, or if there is felt to be sufficient work for two junior tenants, the Pupillage Committee will consider whether to advertise for a pupil for an additional period of pupillage (taking into account whether the necessary extension of the pupillage period is likely to be granted by the BSB), probationary starter tenant or a starter tenant. In respect of a probationary starter tenant or a starter tenant, the Pupillage Committee will seek approval of Chambers before so advertising.
- 93. The Pupillage Committee or such other Committee as may be agreed by Chambers will agree a procedure for recruitment of a pupil for an additional period of pupillage, probationary starter tenant or starter tenant. The Selection Criteria will apply to the recruitment of a pupil for an additional period of pupillage, probationary starter tenant or starter tenant.
- 94. A pupil who has not been offered tenancy under the procedure set out at paragraphs 88 to 89 above may, at the discretion of the Pupillage Committee, be invited to apply for the position of a pupil for an additional period of pupillage, probationary starter tenant or starter tenant.

95. Any offer of pupillage for an additional period of pupillage will be subject to Chambers obtaining the necessary extension of the pupillage period from the BSB.
96. Supervision, training and work allocation will be tailored to the circumstances of any pupil doing an additional period of pupillage.

Tenancy

Rooms

97. A starter tenant will be allocated a room or shared room in Chambers according to the space available. Chambers believes that it can be good practice for a starter tenant to spend a period of time sharing with a more senior member of Chambers and this will be taken into consideration when a room is allocated.

Expenses

98. A starter tenant will:
 - a. pay clerks' commission on fees earned after the start of their tenancy;
 - b. not pay Chambers expenses for the first six months of their tenancy. Thereafter, Chambers expenses are paid on a pro rata basis, according to the fees received in comparison with the fees received by other members of Chambers, in accordance with the terms set out in Chambers' Rules; and
 - c. not pay rent and rates for the first year of their tenancy.

Distribution of work

99. The allocation of work to tenants will not be influenced by the race, colour, ethnic or national origin, nationality, citizenship, gender, gender reassignment, sexual orientation, political persuasion, marital status or civil partnership, pregnancy or maternity, disability, age or religion of the tenants. The allocation of work is monitored in compliance with the Equality and Diversity Rules of the BSB Handbook by Chambers Equality and Diversity Officers.

Mini-pupillages and work experience

Mini-pupillages

100. Chambers will have a Mini-Pupillage Secretary who will be in charge of the administration of mini-pupillages and social mobility schemes and who will be the point of contact for members of chambers who want to give informal work experience. That secretary will, generally, be the second most junior tenant. They will, when necessary, be assisted in marking the applications, generally by the most junior tenant. Both will undertake fair recruitment training. Chambers' "Mini-pupillage Selection Criteria", each of which will be marked out of six, are:
- a. Academic ability.
 - b. Analysis and reasoning.
 - c. Written communication skills.
 - d. Oral communication skills.
 - e. Resilience, perseverance and a drive to succeed at the Bar in England and Wales.
101. Chambers offers a limited number of two day non-assessed mini-pupillages to those who would like to gain experience of life in a Chancery set. They can be obtained in three ways.
- a. Anyone who has completed at least the first year of a law degree or has applied for or obtained a place on a law conversion course can apply for mini-pupillage using the application process set out below. Chambers generally awards around nine such mini-pupillages per year.
 - b. Chambers takes part in social mobility schemes, such as Bridging the Bar and the Pegasus Access and Support Scheme, which can involve participants being offered a mini-pupillage in Chambers. Eligibility for such mini-pupillages is a matter for the scheme providers.
 - c. Chambers sometimes runs a mooting competition in conjunction with the University of Law. In years where this competition takes place, students at the University of Law may take part in the competition and the competitor who is judged to be the best advocate will be offered a mini-pupillage in Chambers.

102. Mini-pupillages for which general applications are made are available during three periods of the year, each with a separate deadline, as follows:

- a. For mini-pupillages in January or February, applications must be made by 1 November.
- b. For mini-pupillages in April or May, applications must be made by 1 March.
- c. For mini-pupillages in September or October, applications must be made by 15 July.

103. As part of Chambers' commitment to widening access to the Bar, one mini-pupillage in every period will be reserved for a candidate from an under-represented background who meets at least one of Chambers "Access Criteria" (an "Access Mini-Pupillage"). Those criteria are as follows:

- a. The candidate was eligible for free school meals (other than Universal Infant Free School Meals);
- b. The candidate's family has received some form of income support benefit;
- c. The candidate has (or has previously had) caring responsibilities (for these purposes, "long-term caring responsibilities" means a commitment to providing unpaid care to a family member or friend who could not cope without your support. This may be due to illness, disability, a mental health issue, or substance misuse. The caring responsibilities must have lasted (or be likely to last) for at least 6 months);
- d. The candidate was in care;
- e. The candidate is or was a refugee or asylum seeker.

For the avoidance of doubt, candidates who apply for an Access Mini-Pupillage are still eligible, and will be considered, for the other mini-pupillages on an equal footing with other candidates. Those candidates who have been offered and have accepted or completed an Access mini-pupillage will be guaranteed a first-round pupillage interview on the first occasion that they apply for pupillage thereafter. To take advantage of this, candidates must apply to Chambers through the Gateway and inform the Pupillage Secretary that they have made an application. This information should be emailed to naomiwinston@tenoldsquare.com.

104. Applications for mini-pupillage:

- a. must be made on Chambers' standard mini-pupillage application form which can be downloaded directly from the mini-pupillage page of Chambers' website. Alternative formats can be provided, if necessary, to those candidates who require it;
- b. should, save in exceptional circumstances, have text typed in and be saved in Word or PDF format;
- c. must, for those wishing to apply for an Access Mini-Pupillage, have section 9 of the application form completed;
- d. must reach Chambers no later than the deadline date for applications. Applications cannot be considered for the relevant mini-pupillage period after the deadline date has passed but will be considered for the next mini-pupillage period;
- e. will, save in exceptional circumstances, only be accepted by email sent to minipupillage@tenoldsquare.com.

105. Applications for mini-pupillage will be marked according to the criteria set out above at sub-paragraphs 13 (b), (c), (e), (f) and (h). Where applications for Access Mini-Pupillages are being assessed, the information at section 9 of the application form will only be used as a threshold test; it will not form part of the assessment as to which of the Access Mini-Pupillage candidates should be offered the Access Mini-Pupillage. Where there are a large number of applications, they will be divided in half, with one half being marked by the Mini-Pupillage Secretary and the other by the additional marker. The top three applications from each batch (including at least one Access candidate) will then be double marked. After that double marking, the three candidates with the highest scores (including at least one Access candidate) will be offered mini-pupillage (with one of those candidates being given the Access mini-pupillage).

106. The Mini-Pupillage Secretary will contact each applicant by email to inform them whether their application for mini-pupillage has been successful within a reasonable time after the relevant deadline. The Mini-Pupillage Secretary will also arrange the dates on which the mini-pupillages for the successful candidates are to take place and will organise supervisors for them.

107. Those candidates who are invited for a mini-pupillage, who live some distance away from Chambers and who cannot, or cannot comfortably, afford their travel expenses (i.e. are experiencing hardship) may make a request to the Mini-Pupillage Secretary by email for payment of, or a contribution to, their reasonable travel expenses within the UK of attending the mini-pupillage. Each request will be considered by the Mini-Pupillage Secretary and responded to in a timely manner.

108. An unsuccessful applicant for mini-pupillage should not be deterred from applying for pupillage. The fact that an applicant has not been offered a mini-pupillage does not in any way prejudice their chances of being offered a pupillage. Further, an individual's performance during a mini-pupillage is not taken into account in considering any subsequent application for pupillage.

Work experience

109. Members of Chambers may also offer informal work experience in appropriate circumstances, but such work experience should not be offered in circumstances where it would interfere with a mini-pupillage offered in accordance with the process set out above. The application process set out above does not apply to such informal work experience or to work experience which may be offered with the clerks. Before offering informal work experience to minors, members of Chambers should discuss with the Mini-Pupillage Secretary and satisfy themselves that they can offer the work experience in compliance with their confidentiality and data protection obligations.

Conduct during mini-pupillages/work experience

110. A mini-pupil or work experience student will sit with a member or members of Chambers (their "supervisor(s)") and look at the work they undertake.

111. During a mini-pupillage or work experience, the mini-pupil/work experience student must:

- a. follow the instructions and guidance of their supervisor, which may include reading papers, research, drafting or attending conferences, mediations and hearings;
- b. not give advice to the clients of any member of Chambers or contribute during any meeting with a lay or professional client or at court (or other tribunal);

- c. preserve the confidentiality of every client's affairs, including clients of the supervisor and other members of Chambers for whom the mini-pupil carries out work or discusses a case. The mini-pupil/work experience student will be asked to sign a confidentiality form at the start of the mini-pupillage. Mini-pupils/work experience students should not take out of Chambers any books or papers belonging to members of Chambers; and
- d. unless otherwise told, wear dark clothing/business attire appropriate for attendance at court at all times when in Chambers or accompanying a member of Chambers for work purposes.

112. Any problems during mini-pupillage or work experience should be raised with the supervisor or the Mini-Pupillage Secretary.

Data protection

113. Chambers has a Data Protection Policy which will be followed when recruiting pupils (whether funded or unfunded), mini-pupils and new tenants and in relation to pupils (whether funded or unfunded), mini-pupils and work experience students. The following provisions relate specifically to data collected under this policy.

Categories of data

114. Chambers has divided pupillage, mini-pupillage, work-experience and recruitment data into the following categories:

- a. Pupil and pupillage applicant data: names, email addresses and contact details, application forms or CVs, contextual information and equality and diversity questionnaires, references, success/failure, email correspondence of pupillage applicants and pupils and data provided by pupils during pupillage;
- b. Applicants' referees' data: Names, email addresses and contract details of applicants' referees;
- c. Careers officers'/law tutors' data: Names, email addresses and contract details of careers officers and law tutors at providers of the academic training component (such as QLDs and GDLs) or the vocational training component (such as BPTCs);

- d. Advertisers of pupillages' data: Names, email addresses and contract details of employees of businesses which advertise pupillages (B2B);
- e. Bar Council (including the Pupillage Gateway)/BSB/Inns of Court data: Names, email addresses and contract details of employees of or volunteers at the Bar Council, BSB, Inns of Court or Chancery Bar Association who deal with pupillage (B2B);
- f. REALrating/UpReach data: Names, email addresses and contract details of employees of REALrating and UpReach who provide contextual recruiting support;
- g. Mini-pupillage/work experience data: addresses and contract details, application forms or CVs, references, equality and diversity questionnaires of applicants for mini-pupillage or work experience;
- h. Tenancy applicant data: Names, email and contact details, CVs, references, email correspondence of applicants who have completed pupillage and apply to become members of Chambers.

Retention policy

115. Save in exceptional cases, where consent is given or where Chambers has a legitimate interest in retaining data, Chambers will retain data in relation to the above categories for the following periods:

- a. Pupil/starter tenant data shall be retained indefinitely, save that there may be deletion on request, in line with the policy on requests for deletion set out below, although this may result in an application not being progressed;
- b. Pupillage applicant data:
 - i. generally, deletion after six years, except in exceptional circumstances and save where data relates to the applicant who accepts pupillage which shall be retained in accordance with (a) above;
 - ii. deletion on request, in line with the policy on requests for deletion set out below, although this may result in an application not being progressed;

- c. Pupillage applicant referees' data:
 - i. generally, deletion after six years, except in exceptional circumstances and save where data relates to the applicant who accepts pupillage which shall be retained indefinitely;
 - ii. deletion on request, in line with the policy on requests for deletion set out below, although this may result in an application not being progressed;
- d. Careers officers'/law tutors'/members of law society's data:
 - i. generally retained until informed that person is no longer in role; or
 - ii. deletion on request, in line with the policy on requests for deletion set out below;
- e. Advertisers of pupillages' data:
 - i. generally, deletion after seven years of advertising (expiry of limitation period, plus one year), except in exceptional circumstances;
 - ii. deletion on request, in line with the policy on requests for deletion set out below;
- f. Bar Council (including the Pupillage Gateway)/BSB/Inns of Court/Chancery Bar Association/REALrating/UpReach data:
 - i. Generally retained until informed that person is no longer in role; or
 - ii. deletion on request, in line with the policy on requests for deletion set out below;
- g. Mini-pupillage/work experience data:
 - i. for those who are offered an Access mini-pupillage, deletion after three years;
 - ii. for all other applicants, generally, deletion after one year or if you have asked for a reference, for a period of one year after that reference has been provided, except in exceptional circumstances;

- iii. deletion on request, in line with the policy on requests for deletion set out below, although this may result in an application not being progressed;

h. Starter tenancy applicant data:

- i. generally, deletion after three years, except in exceptional circumstances, save where data relates to an applicant who accepts tenancy which shall be retained indefinitely;
- ii. deletion on request, in line with the policy on requests for deletion set out below, although this may result in an application not being progressed;

116. Where Chambers is asked by a data subject to delete data, best endeavours will be used to delete that data within one month of receipt of the request, unless there is a good reason for it to be kept (for example, that both the data subject and Chambers or a member thereof are party to proceedings to which the data is relevant).

Review Plan

117. Best endeavours will be used by the Pupillage Secretary and Mini-Pupillage Secretary to review once every six months and, in any event, not less than once every twelve months any data which has reached the end of its retention period. The data will be reviewed in the groups set out in the retention policy section above and some or all of these groups may have different review dates. The review will identify which of that data should be deleted or destroyed because:

- a. Chambers no longer has a legitimate interest in retaining it;
- b. The basis of retention was consent and that consent has been withdrawn or expired;
- c. The retention period in relation to that data has come to an end and there is no reason to retain the data.

118. The data will be marked for deletion or marked for retention for a further period. Save as specified below, continued retention is likely to occur only where the information is needed for legal proceedings, regulatory matters or active complaints.

119. Where it is determined that there is no longer a reason to retain data, it will be destroyed, deleted (without further notice to the data subject) as soon as reasonably practicable after the data is marked for deletion.

120. Data held by other members of Chambers or the clerks will be reviewed every twelve months using the same principles.

Review of pupillage policy

121. Chambers' Pupillage Policy is reviewed at least annually, generally prior to the next recruitment round, but is liable to be changed at any time.

122. In accordance with paragraph 8 above, amendment to or replacement of this policy shall be made by decision of the Pupillage Committee, though no such change or replacement may be contrary to Chambers' other policies or Chambers' Rules.

123. This version was approved on 8 May 2025.