CLLS Submission re Requirements for lawyers qualifying as solicitors in England and Wales

Set out below, for your information, is an extract of the City of London Law Society's covering email and submission regarding the above.

Covering email

Attached on behalf of the City of London Law Society (the "Society") is the completed Consultation Questionnaire Form setting out the Society's responses to the questions raised in the Consultation Paper issued on 25 February 2008.

The member firms of the Society include a number of firms which are significant recruiters of potential "QLTR entrants". Accordingly, the QLTR process is of importance to the Society's member firms insofar as it impacts on the firms' recruitment processes (by making this jurisdiction attractive to QLTR entrants or not, as the case may be) and on the firms' resourcing processes (if, for example, the QLTR requirements involve a QLTR entrant "rotating" around the firm).

We are aware that the SRA are making the proposals detailed in the Consultation Paper so as to ensure better regulation of the English profession. However, many of the Society's member firms hold very strong views on the likely international implications of the principal proposed change to the QLTR regime - the introduction of a requirement that all QLTR entrants should have gained 12 months experience working on English Law for an English qualified solicitor prior to admission.

The Society's views on the issues in the Consultation Paper relating to the granting of exemptions and the moratorium on the expansion of the current group of QLTT providers will be clear from the attached Questionnaire Form.

However, we wish to put into context our views on the 12 month work experience issue and on the urgent need (recognised in the Consultation Paper) to address the current inconsistencies in the work experience requirements being imposed on QLTR applicants.

1. What is the problem the proposal is designed to address and has the right solution been chosen?

The Consultation Paper makes it plain that the proposed "12 month supervised English law experience" requirement is designed to address the issue of "QLTR qualifieds" being disproportionately represented among solicitors who are subject to disciplinary proceedings. To state the obvious, we support the SRA's wish to address this issue as it is clearly in the interests of the profession at large that these problems are stopped without delay. We are, however, aware from discussions with the SRA that any short-term changes need to be within the scope of the current Regulations so that more radical changes to the QLTR regime will have to wait until the full-scale review of the QLTR (to which the Society is already contributing) is completed in a couple of years' time.

Our understanding is that the disciplinary issues relate to some combination of lack of knowledge and/or poor practice/people/client management. However, we do not have access to the SRA's detailed evidence and so are handicapped in terms of contributing to finding a solution which works for all of the stakeholders and which does not, therefore, have any unintended adverse consequences.

To help find a suitable solution, we ask that the SRA publish without delay the evidence on which the interim proposals are based so that a debate can be conducted in the light of the full facts.

That said and recognising that our knowledge of the problem to be solved may be limited, imposing a "blanket" work experience requirement does not seem to us to be the right approach.

If the SRA has found that the knowledge of some QLTR qualifieds is at fault, a period working in English legal practice will help but a much better answer is to improve/extend the QLTT exams (though we appreciate that is not a "quick fix").

If the "attitude" (by which we mean their approach to legal practice management) of the "bad" QLTR qualifieds is at fault, changing the current system to require all future QLTR entrants to have worked for an English solicitor for a period will not necessarily address the problems identified. These QLTR entrants could satisfy the requirement by working for the very solicitors who have themselves been subject to the disciplinary procedures with the result the "training" these QLTR entrants receive could perpetuate the problems.

What are the possible better solutions to the "attitude" problem? There are several (though we realise some may not be workable under the current regulatory regime) including:

a) a course to give them the necessary guidance (and this would mean introducing compulsory training into the QLTR regime);
b) preventing QLTR qualifieds who have been subject to disciplinary proceedings (or indeed any solicitor who has followed the normal English route to qualification) from employing QLTR entrants for a period; or
c) imposing a requirement that QLTR entrants need to have worked for three years with an English solicitor (say, one who has not been subject to disciplinary proceedings) before they are allowed to set up in practice on their own.

Options (b) & (c) could, we believe, be introduced in relatively short order.

Bearing that in mind and picking up the question in the Consultation Paper as to whether the "12 month supervised English experience" requirement is a "reasonable and proportionate" solution to the problem, we find it hard to see that it is.

As the SRA acknowledge, the problems are being caused by a small number of QLTR entrants. Therefore, the change (however effective or otherwise we may think it will be), affects all QLTR entrants, most of whom cause the SRA no problems whatsoever. The change does not, therefore, seem especially proportionate.

On the question of reasonableness, it is entirely reasonable to require someone planning to practise here to have experience in English law (as we have made plain in our answers in the Questionnaire). However, our view is that it is unreasonable to prevent some lawyers (for example, those qualified in QLTR jurisdictions who are based overseas and without ready access to employment with an English solicitor) who can currently qualify here from doing so in future. (These views are not inconsistent. We have suggested in our answers in the Questionnaire that these "overseas-based" lawyers be allowed to qualify as "non-practising solicitors" and we would expect them to have to prove some English law experience prior to being granted a practising certificate.)

2. The Work Experience Requirement

As we have made plain, we agree that a lawyer planning to practise here should have some experience of English law.

As a result, while we understand the restraints imposed by this country's EU obligations, it is strange that lawyers from the civil law jurisdictions of the EU can qualify as English solicitors and practice here with no practical experience of English law. We do, however, see that that issue is outside the scope of the current Consultation and instead trust it will be borne in mind when the wider review of the QLTR regime is carried out.

Our answers in the Questionnaire set out our views on the length of the work experience requirement, the nature/level of the supervision needed while the QLTR entrant is meeting any outstanding period of experience and the breadth of the experience needed. Nevertheless, we wish to reinforce those points here:

The length of the work experience requirement

We agree that the current overall experience requirement of two years of common law practice should be retained.

As regards the proposal to require that 12 months of that be in English law under the supervision of an English solicitor, we have given our views on the effectiveness and reasonableness of that insofar as it relates to the "problem" QLTR qualifieds and the QLTR entrants based overseas with no access to employment with an English solicitor.

Turning to the QLTR entrants working for our member firms (whether in this jurisdiction or overseas), the reality is that a period of supervised English experience will not cause any difficulties (subject to our points on supervision and breadth of experience). For the sake of clarity, we have assumed that (in line with the existing procedure) this period, if it is introduced, is a pre-requisite for admission, not a pre-requisite for the issue of the Certificate of Eligibility.

We do, however, have doubts as to whether the period should be 12 months rather than some shorter period of, say, 6 months. Accepting that this group is not the real target of the proposed change, what is achieved by them complying with the requirement? One answer is an assimilation into English law/practice. Given that most/all come from jurisdictions with well-developed & highly reputable legal professions, 12 months may be too long for that assimilation, particularly in the case of more senior QLTR entrants.

We do, of course, acknowledge that many of the QLTR entrants working for our member firms begin the QLTR process only once they start working here. The time it takes to complete the prequalification process (even if the QLTR entrant is only sitting one exam) means they will have inevitably gained several months of supervised English law experience before they are admitted.

The nature/level of the supervision needed while the QLTR entrant is meeting any outstanding period of experience

The Questionnaire at least contemplates that the "standard" of supervision could be that applied when supervising trainee solicitors (though we are aware that the SRA is not, in fact, proposing that).

In our view, it is wholly inappropriate to impose such a level of supervision on all QLTR entrants. It might be the right level of supervision for very junior QLTR entrants who have little or no practical experience in their home jurisdictions. It would be inappropriate for very experienced QLTR entrants.

Therefore, we have advocated in our answers to the Questionnaire that the right level of supervision is that which a solicitor would apply in the day-to-day management of his or her qualified associates. (That is logical since QLTR entrants are qualified in their home jurisdictions.) This would, therefore, be tailored to meet the particular requirements of the individual QLTR entrant. A junior one would receive close supervision; the supervisor would apply a "lighter touch" with a more senior QLTR entrant.

While this may not be a general issue, some London offices of highly reputable international firms may struggle to meet the requirement as to the number of years for which the QLTR entrant's supervisor has held an English practising certificate. A QLTR entrant working for such a firm could be supervised perfectly effectively by a very senior, say, Australian lawyer who happened to re-qualify in this jurisdiction less than 5 years ago. In that case, that QLTR entrant may have his or her qualification delayed unnecessarily. Potentially, an undesirable outcome.

The breadth of the work experience

Many of our member firms have experienced difficulties with the requirement that QLTR entrants have gained experience of three separate areas of practice, one of which must have been contentious, within the past five years.

While we agree that a breadth of experience is a good foundation for any lawyer's career, most lawyers specialise after a few years in practice. Therefore, we consider that a distinction should be drawn between the breadth of work experience requirement imposed on "senior" entrants and that imposed on "junior" entrants.

We recognise the difficulty in drawing the line between "senior" and "junior" entrants. At a minimum, a "junior" entrant is one with less than two years of practical experience (wherever gained). At the other end of the spectrum, once a lawyer has five years of experience, he or she is definitely "senior" for these purposes so the line is somewhere between two and five years.

Simply because once an English trainee has completed his or her Training Contract, the "three areas" rule ceases, we suggest the breakpoint is after two years of practical experience.

Be that as it may, for "senior" entrants, our view is the "three areas in the last 5 years" rule (often requiring lawyers to "rotate" through different departments in the firm) is of little or no value and should be dropped.

We understand the SRA may be concerned by such a suggestion but what is the purpose of the rule? To expose the lawyer to a breadth of practice. Most, if not, all of these individuals will have done that at some earlier point in their careers and this artificial "rotation" will add little.

Dropping the requirement that these "senior" QLTR entrants must prove a breadth of experience will mean taking their breadth of experience on trust. However, they do all come from jurisdictions which the SRA see as "reputable". If that needs to be

reviewed for whatever reason, there are different steps the SRA should take - discussions with the relevant Bar Associations, special guidance in relation to QLTR applications from lawyers from those jurisdictions, the imposition of restrictions on the practising certificates of lawyers wanting to practice in areas of which they have no experience in this jurisdiction or whatever).

Turning to the "junior" entrants (as we define them), we agree the "three areas" rule should be retained. However (and as the Consultation Paper acknowledges), there is an urgent need to address the current inconsistencies in the experience requirements being imposed on would-be QLTR entrants.

Many QLTR entrants have had wildly differing periods of, in particular, contentious experience imposed on them - from three months up to 8 months. The reasons for those periods are not always clear but, that aside, such uncertainty causes havoc with resource planning and can lead to a "box ticking" exercise of limited developmental or business value to anyone.

Therefore, we ask that the SRA issue clear guidelines without delay (for the benefit of the SRA's own staff as well as QLTR entrants & their employers) on what experience is acceptable.

As we have made plain in our answers, the guideline should be that the experience requirement can be satisfied either by a fixed (not minimum) period of three months (in aggregate, if necessary) or by a structured course coupled with practical experience so that QLTR entrants are treated in the same way as English trainees.

Although this follows from that, experience overseas should be just as acceptable as should experience gained post-graduation but pre-admission under the formal traineeship rules in the QLTR entrant's home jurisdiction.

As we have made plain in this message and in our answers in the Questionnaire, our concern with the current work experience regime is that it does not adequately reflect the reality of practice. We understand the difficulty involved in a truly individually-tailored approach but the guidelines we are suggesting could be easily operated by the SRA officials and will be clear to the QLTR entrants (as well as their employers).

3. Lawyers based overseas with no access to employment with an English solicitor

To reinforce the points we have already made in respect of these lawyers, they will be prejudiced by the "12 month supervised English experience" rule. Without attempting to give any advice, this would seem to be potentially discriminatory, at the very least.

We see that the SRA's function is to regulate the English profession (rather than facilitate its expansion) but this change could adversely affect the current on-going discussions with, for example, the Indian authorities to open access to the Indian legal market. In addition, this may be contrary to our GATS obligations and undermines the efforts put in over the years to establishing English law as one of the two principal global legal systems.

4. The need for a full-scale review of the QLTR

Finally, our collective experience of the QLTR route over the years is such that we consider it is long overdue for a review and the Society is actively supporting that by being represented on the SRA's QLTR Review Working Party.

We know that a full-scale review of the QLTR could take up to two years to implement and understand the SRA's desire to address the problems caused by some QLTR qualifieds.

However, for the reasons we have explained in this message and in our answers to the Questionnaire, we do not consider that the planned core proposal (the "12 months supervised English experience" rule) will achieve the desired result. Indeed, the interim measures are out of line with the SRA's announced outcomes-based approach to training and planned entity-based regulation system so will have to be "unpicked" at some point in the future.

Our view is that the time and effort of the stakeholders in the QLTR process would be better spent looking for alternative ways of addressing the "problem" QLTR qualifieds and accelerating, so far as possible, the full-scale review of the QLTR.

Submission

SRA Question	CLSS Response
1. Should all solicitors admitted in England and Wales have had some prior experience of working within English and Welsh law, however they qualify?	Yes. Knowledge of the law and practice relevant to the particular area in which a lawyer works is, of course, a prerequisite of providing an appropriate service to his or her clients. That knowledge can perhaps best be acquired through a rigorous examination process coupled with practical experience. Therefore, our favoured approach would be to upgrade the QLTT exams and have would-be entrants to the English profession gain some "hands on" experience of English legal practice (whether that was gained in this jurisdiction or by working for an English solicitor internationally). We know any upgrade of the QLTT will be part of the wider, longer-term QLTR review rather than as part of this interim review and so we will not focus on possible changes to those exams here. Looking at the practical experience aspect, our view is that it has two purposes - the acquisition of specialist, practical expertise and the acquisition of an understanding of the English approach to "effective lawyering" (that is, good business, work, client & people management). While a well-structured course can give excellent guidance on specialist practice, that does need to be supplemented/complemented by some "hands on" experience. As a result, our view is that some time spent working under the supervision of an English solicitor is necessary for a lawyer planning actually to practice English law. However, we do not see that it is necessary for a lawyer who does NOT intend to practice English law and so we see no need to change the current approach of allowing would-be QLTR entrants based overseas to go through the qualification process

	without having any practical experience in English law. The protection which the planned introduction of the "12 month English experience rule" is intended to give can be achieved by only issuing practising certificates to QLTR entrants if they can prove they are practising English law under the supervision of an English solicitor. That would mean moving the work experience requirement for this particular category of QLTR entrants to a post-qualification point. How do we envisage that working? A simple process would be that those who confirmed they intended to practise needed to gain experience prior to admission. Those who said they did not could qualify as "non-practising solicitors". Were they to change their minds at some point subsequently, they could be required to work under the supervision of an English solicitor for some specified period before they could receive their first practising certificate. We do, however, see this is not necessarily a perfect solution as the "non-practising solicitor" (even if he or she declared that status) might still advise on English law (albeit not the reserved areas of law). Turning to the specific proposals in the Consultation Paper, we have real concerns whether the planned "blanket" 12 month work experience requirement will be of any benefit. Other than a requirement to "work for an English solicitor", there are no controls on the experience. The quality & breadth of that experience and the monitoring/supervision of it could be very variable. In addition, there is nothing to stop the "bad" QLTR qualifieds (who are the reason for the planned interim changes) employing these entrants and teaching them bad habits. As we have said, some form of rigorous examination process is a better approach to adopt if the high standards of "practice management" are to be maintained. While we understand these interim changes are designed to be a "quick fix" pending the results of the wider review of the QLTR, the planned "tick box" experience approach is strangely at odds with the SRA's outcome-based plans for the rest of legal training. Furthermore, making it a requirement that all entrants following the QLTR route should have gained experience in English law will be a significant barrier to entry to the profession by many lawyers who currently can take advantage of this route (see the covering email). However, our "non-practising solicitor" suggestion (see above) will avoid that difficulty. We are aware of the reasons for it but it is odd that this work experience requirement can be imposed on lawyers from common law jurisdictions while EU lawyers from civil law

	jurisdictions face no such requirement. Finally (and obvious though the reasons for it are), looked at objectively, it is perhaps even stranger that it is possible for many areas of legal work to be carried out by individuals with no legal qualifications and little or no practical experience.
What should be the length of the prior experience required?	Taking it as read that some practical experience is needed for lawyers planning to practise in this country, the length of the period needs to fit with the training/developmental needs of the individual. Any "blanket" period will cause problems - for some it will be too long, for others it will be too short. A very experienced practitioner transferring from practice in one of the jurisdictions recognised under the QLTR to this country probably needs a minimal "assimilation period". A very inexperienced lawyer may need longer. That said, we see the regulatory difficulties of truly flexible experience periods though the arbitary 12 month period chosen in the Consultation Paper is probably too long. In our view, the time it takes most lawyers to get through the QLTR process (6-9 months) is a reasonable minimum period of exposure to practise in this jurisdiction. For lawyers based overseas who (for whatever reason) want the qualification but do not intend to practice English law, a period of practical experience is unnecessary (hence our "non-practising solicitor" suggestion). To repeat a point we have already made, whatever the required experience period, the status, strength and importance of the brand of "English solicitor" is such that it needs to be protected. At the very least, the QLTT needs to be made more rigorous and (probably) extensive.
2. Should all solicitors admitted in England and Wales have experience of different types of legal work, gained either in the law of England and Wales or in another common law system?	Yes. It is a fact that the majority of solicitors specialise to a greater or lesser extent. However, that (usually) happens after a period of being exposed to a broader range of practice (during the Training Contract at least, if not post-qualification as well). While not all of the QLTR jurisdictions have traineeships as part of their qualification processes, the approach of gaining (fairly) broad experience during the early career years followed by specialisation is common globally. Given that, imposing a blanket requirement that all QLTR entrants need to have recent experience in a range of areas of practice ignores the reality of legal practice. It achieves little to impose on a "specialist" lawyer with a reasonable period of broad practical experience an obligation to gain experience in one or two unrelated areas of work just to meet a "blanket" work experience requirement. Therefore, we consider that if an entrant has sufficient (say, two

	years or more) experience in one of the jurisdictions recognised under the QLTR, that should be enough. For the sake of clarity and consistency, we would not advocate the SRA should enquire closely into the precise nature of the prior experience of such "experienced" entrants. However, in the case of more junior entrants (with less than two years experience), proof of a spread of experience (whether in their home jurisdiction and/or here) is probably appropriate. We see no objection to the requirements as to the spread of experience being the same as is imposed on English trainees. Equally, the way they can satisfy this work experience requirement should be the same as for English trainees. Following on from that last point, while "hands on" experience is a way of meeting an experience requirement (whatever the precise terms of the requirement and to whoever it may apply), it is not the only way. We are of the view that a well-structured "experiential" course (so structured training plus a defined period of practical experience) can be just as effective a way of giving a lawyer the "foundation level" exposure to a particular area of practice. To the extent a QLTR entrant does need to meet a further work experience requirement, he or she should be able to do so in the same way as an English trainee can. Therefore, for example, a QLTR entrant needing contentious experience should be able to satisfy that requirement by attending a week-long course plus doing pro bono work.
What experience of different types of legal work should be required?	To repeat the point we have made in the previous box, lawyers should be exposed to a range of areas of practice but this needs to reflect reality. Our view is that it is pointless to impose on senior, experienced, specialist lawyers the same work experience requirements as are faced by junior inexperienced ones. A QLTR entrant with, say, 5 or 10 years experience in his or her home jurisdiction has very probably been exposed to a broad range of experience albeit outside the SRA's 5 year cut-off point. Forcing that lawyer to "refresh" that experience adds little to the lawyer's development and (depending on how the experience is "refreshed") could be positively damaging to the lawyer and/or his firm/practice. The current "blanket" requirement is wholly illogical when looked at in the light of what commonly happens in practice. Many of our member firms recruit senior, experienced lawyers to practice in specialist areas, say, finance law. While those recruits will go through an adjustment process as they "transition" into working in English law, the reality is that the work they are doing in this country is not so very different from what they have done "back home". It is odd that those individuals (who have chosen voluntarily to submit themselves to the SRA's regulation) are required to "refresh" their experience of an area of practice of

	perhaps marginal relevance to their "day jobs" while their English qualified colleagues (often with virtually identical experience) are under no such obligation. Turning to "junior" lawyers, imposing on them an obligation to show they have gained exposure to three areas of practice is more reasonable. However, there must be some flexibility on how that experience is gained (see above). The current guidelines on work experience for QLTR entrants talk in terms of periods of experience of separate areas of practice needing to be "of no less than three months". However, many of our member firms have seen wildly different experience requirements (usually of contentious work) imposed on their QLTR entrants. At one end of the spectrum (and this is the majority of instances), this has included periods of anything between 3 and 8 months. At the other end, we have heard of one instance where somewhat less than the three month requirement has been imposed. Furthermore, we have come across instances of QLTR entrants who have gained contentious experience in their home jurisdictions who have nevertheless been required to gain further contentious experience in this jurisdiction. The current guidance allows non-English common law experience to count and so (assuming the overseas experience is broadly in line with English experience) it is inexplicable that it would be ignored. There also seems to be some confusion over whether experience gained during the overseas equivalent of a post-graduation traineeship can count. It is only logical that it should. These inconsistencies are causing chaos and must be addressed. We suggest that the guidance be that a QLTR entrant can meet the requirement by gaining common law experience (whether in this jurisdiction or one covered by the QLTR) with all experience post-graduation counting even if it is gained during a "pre-admission" traineeship. Furthermore, it should be allowed for that experience to be gained either by a fixed (rather than minimum) period of three months (in aggregate, if needs be, rather than necessarily over a continuous period) or by attending a course plus some shorter period of work experience. (We do have in mind the "contentious course plus law clinic" programmes which many trainees go through but this does not have to be limited to contentious work.)
3. How should required prior experience be supervised? For example, should supervision be by an	Effective supervision by an experienced lawyer is essential if standards are to be maintained. However, the nature of the supervision must fit the circumstances. A junior lawyer needs closer supervision than a senior one but,

experienced solicitor? Should it align with the supervision required for trainee solicitors? Should it be more general?	over and above that distinction, we do not see it is necessary that QLTR entrants (all of whom are fully qualified in "recognised" jurisdictions) need to be subject to the close supervision regime applicable to English trainees.
Question 4: Do you agree that the draft guidance is a reasonable and proportionate wayof ensuring that all transferring solicitors are fit to practise?	No. Whether the proposed changes are "reasonable and proportionate" depends on the "ill" they are intended to address. The Consultation Paper states that one reason for the proposals is to address the problem of QLTR entrants being disproportionately represented among the total number of solicitors who are subject to disciplinary hearings. Without knowing precisely what disciplinary breaches that group have committed, it is difficult to know what impact the extra experience requirement would have. However, if the expectation is that this will expose them to "best practice" and so remedy the problem, that thinking is flawed. The proposals place no restriction on who QLTR entrants work for and so there is no guarantee that in the future they will indeed be exposed to "best practice". They could continue to learn bad habits from "bad solicitors". Given that, the result is that the proposals are not certain to have any real impact on the problem and they will represent a greater barrier to entry to some entrants than is the case under the current regime. Our view is that a better solution is to upgrade the QLTT to ensure that all solicitors possess a basic level of knowledge of law & practice. If that is not feasible as an interim measure to address the problems the SRA have identified, the SRA should make more use of its disciplinary and supervisory powers.
Question 5: Should exemptions be granted from a stipulated part or parts of the QLTT?	Yes. We agree it should be possible to gain exemption from any or all of the heads of the QLTT. The determining factor should be whether the entrant has covered the relevant syllabus. The easiest way of proving that is by having passed an exam at the end of a rigorous academic programme. However, it should be possible to be granted an exemption on the basis of practical experience in the subject (provided the whole of the relevant syllabus has been covered). We recognise the entrant's knowledge must be fairly recent, and so can see the benefit of having a "cut-off" period. Therefore, for example, exams passed more than 5 years previously should be ignored for the purpose of an application for exemption.

	Furthermore (and as we have already indicated), while this does not fall within the current Consultation, we would support a review of the QLTT which resulted in an extension of the subjects covered by the Test. The QLTT should be a rigorous examination which gives reassurance to all the stakeholders in the process that the academic knowledge of all solicitors (whichever route to qualification they have followed) is broadly the same. While the QLTT may focus on knowledge of law & practice, it can also promote "best practice" in law firm management, especially if the current regime is changed to introduce compulsory attendance on a course.
Question 6: Is it reasonable to introduce a moratorium on the SRA's authorisation of new test providers and locations ahead of measures to enable greater assurances to be given about the standard of all QLTTs?	Yes. We do not have strong views on this. However, we can see that the planned fuller review of the QLTR means this is probably sensible from the perspective of all parties. This may not be part of the current Consultation but we would welcome a more rigorous monitoring process of the current QLTTs (by the introduction of a system of external examiners etc.)
Question 7: What are your views on the possible equality impact of the guidance?	As the proposals stand, we see them as being potentially discriminatory, given our view that the proposals do not represent a reasonable and proportionate way of addressing the particular disciplinary problems identified. Accepting that those problems flow, in part at least, from lack of guidance as well as lack of knowledge, we suggest that one way of addressing them would be to retain the two year work experience requirement (albeit with more flexibility in how the work experience is gained than is the case now) and to expand the QLTT. The QLTT heads could cover a broader range of topics (to bring the test in line with the LPC) and if a requirement that entrants attend a course was introduced, clear guidance on the English approach to legal practice could be given.
Question 8: Have you qualified as a solicitor using the QLTR route to qualification?	No.
Are you considering making an	No.

application using the QLTR route to qualification?	
Would you be willing to participate in future research that will inform the full review of the transfer scheme?	Yes.
Please enter below any other comments you would like us to consider.	See covering email (set out above).