**COMPLIANCE PLAN**

This document outlines the firm’s arrangements for compliance with its professional and regulatory responsibilities.

**GOVERNANCE STRUCTURE**

The firm operates as a limited company. In this document the expression “partner” refers to a member of the limited company.

**RISK MANAGEMENT**

The firm is committed to identifying, managing and monitoring risks. That is achieved in these ways.

* **Operational Risk:** The firm has issued a Risk Management Manual to all fee earners, who are required to familiarise themselves with and observe the rules there set out. They must also ensure that secretaries and other support staff who work under their guidance know and observe risk management principles relevant to their work. Partners are required to monitor and enforce compliance with the rules in the Risk Management Manual.
* **Strategic Risk:**  These forms of risk are managed through the governance systems of the firm, as described above.
* **Regulatory Risk:** As explained below, the Compliance Officer for Legal Practice (“COLP”) and Compliance Officer for Finance and Administration (“COFA”) are responsible for monitoring and managing regulatory risk within their respective areas.
* **Risk Register:** The firm has drawn up a register of the most serious risks it faces, and the actions planned to address those risks. That register, and the actions taken under it, is regularly reviewed.

**RESPONSIBILITIES**

**Overall Responsibility**

The COLP has overall responsibility for risk management. This overall role includes the following.

* Identifying and dealing with risk issues which may arise.
* Annually reviewing this policy to ensure it is in effective operation across the practice (including analysing all risk assessment data generated within the practice, including any indemnity insurance claims and client complaints trends).
* In the light thereof making appropriate changes, and reporting thereon to a partners’ meeting.

**Particular Plans and Responsibilities**

The following table sets out the particular plans, policies and procedures that the firm maintains, and indicates the person with responsibility for each.

Where someone other than the COLP or COFA is named in this table they operate under the overall guidance of the COLP and COFA and must report failures in compliance to them.

This is because the COLP has overarching responsibility under the SRA Authorisation Rules for ensuring compliance with the terms and conditions of the firm’s authorisation, ensuring compliance with statutory obligations in relation to the firm’s carrying on of authorised activities, and recording and reporting failures so to comply. The COFA has similar responsibilities in respect of the Accounts Rules. The responsibilities of the COLP and COFA also include monitoring the regulatory deadlines relevant to their roles, and ensuring that they are not missed.

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| **Management Area** | **Person Responsible** | **Status and Review Date** |
| Professional compliance, including   * liaison with and maintenance of authorisation from the SRA * maintenance of indemnity cover * renewal of practising certificates and registrations * provision of regulatory information | Navjot Dhillon |  |
| Operational risk management, including   * client acceptance * conflicts of interest * client care * monitoring client satisfaction * supervision and file reviews * complaints procedure | Navjot Dhillon |  |
| Anti-money laundering | Navjot Dhillon |  |
| Anti-bribery | Navjot Dhillon |  |
| Equality & diversity | Navjot Dhillon |  |
| Human resources, including   * recruitment * checks on new staff or contractors * performance management * training and development | Navjot Dhillon |  |
| Accounting procedures, including   * compliance with Accounts Rules and other regulatory requirements * obtaining and submitting the accountant’s report * budgets * management reports * authority to sign cheques * writing off time and debts * interest * credit control | Navjot Dhillon |  |
| Data protection and information security | Navjot Dhillon |  |
| IT issues, including   * e-mail * internet access * website | Navjot Dhillon | , |
| Add any other management areas where the firm has allocated separate responsibility, for example   * avoiding the facilitation of tax evasion * knowledge management * health & safety * business continuity * storage and safekeeping of documents * outsourcing | Navjot Dhillon |  |