

Company number: 04608905

MINUTES
Costs Lawyer Standards Board Ltd
Wednesday 20 January 2021 at 10.30 am
Remotely by videoconference

- Present:** Steve Winfield (Lay Chair)
Stephanie McIntosh (Lay Vice Chair)
Paul McCarthy (Non-Lay NED)
Andrew Harvey (Lay NED)
Andrew McAulay (Non-Lay NED)
- In attendance:** Kate Wellington (CEO and Company Secretary)
David Heath CBE (Incoming Chair)
Jacqui Connelly (Administration Manager)
Stephen Gowland (NED, Legal Services Board – item 1.3)
Steve Violet (Policy Manager, Legal Services Board – item 1.3)

1. OPENING MATTERS

- 1.1** The Chair declared the meeting quorate. There were no apologies.
1.2 There were no declarations of interest on any agenda item.

1.3 Roundtable with Stephen Gowland, LSB Board Lead for the CLSB

Stephen was invited to join the meeting for an introductory session with the CLSB's board members, supported by Steve Violet (the LSB's relationship manager for the CLSB). Following introductions, Stephen explained his professional background and the perspective he brought to the LSB's board and decision-making process. He noted his experience of working with Costs Lawyers as a practitioner and explained that part of his role as Board Lead for the CLSB was to gain a deeper understanding of the Costs Lawyer market and the CLSB's regulatory priorities, challenges and ways of working at board level. The Board Lead could also act as a relationship touchpoint with the LSB and as a sounding board where necessary.

Board members then asked questions of Stephen. The discussion covered the LSB's forward-looking priorities – particularly those in the strategy for the sector that was currently out for consultation – and how those priorities were likely to impact the CLSB, including resource implications.

Board members also asked about the future of the regulatory performance assessment and the LSB's intentions to carry out more thematic and "deep dive" reviews of certain areas. Steve V explained that the LSB wanted to ensure consistency of approach across its core statutory functions, including regulatory performance, the practising fee approval process and assessing alterations to regulatory arrangements. The aim was for these to work more in concert and for each process to inform the others. Reviews were underway in relation to practising fee approvals and changes to

regulatory arrangements, while the approach on the regulatory assessment had been to focus on the in-depth governance reviews of the BSB and Faculty Office. The LSB was looking to publish preliminary views on those soon. More activity would then follow, but at this stage Steve could not say what or when this would be.

A wider review of the regulatory assessment framework was also upcoming. The group discussed the importance of understanding the differences between regulators in terms of resourcing, and the need to ensure the framework is proportionate in allowing for regulators of varying sizes to achieve similar aims.

The group also discussed the LSB's role as an enabler within the sector and the importance of collaboration. It was agreed that opportunities to consolidate learning and data across the sector for the benefit of all regulators and consumers should be seized upon; this would be central to the success of the LSB's sector-wide strategy.

Steve W thanked Stephen and Steve V for their time and invited them to attend again at a sensible point in the future. He also emphasised that communications between the LSB and CLSB at executive level were now working very well, with thanks to Steve V and Kate, and asked Stephen to convey this to the LSB board as appropriate.

2. MINUTES

2.1 Minutes dated 20 October 2020

The board considered the minutes of its last scheduled quarterly meeting on 20 October 2020. The board agreed the minutes as being a true record for signing.

Action: Publish approved minutes on CLSB website.

2.2 Matters arising

The board considered the matters arising from the minutes of its meeting on 20 October 2020. There were no matters arising that had not been scheduled as agenda items or otherwise dealt with.

3. STRATEGY

3.1 Progress against Business Plan: 2020 roundup

The board was provided with a progress update against the 2020 Business Plan, updated to the end of the year. Kate explained that five further priorities had been achieved in Q4, completing the Business Plan in its entirety other than two items (8 and 10) that were deprioritised earlier in the year.

The board conveyed its thanks to Kate and Jacqui for their achievements during the year that had led to full delivery of the plan. This was a significant achievement and suggested that the new approach to business planning (adopted from 2020) resulted in an ambitious yet realistic and targeted programme of work.

The board discussed the challenges around keeping up momentum and resourcing as new projects came online in 2021 and the initiatives from 2020 became business as usual. The board also agreed that any decisions to defer Business Plan priorities during the year should be revisited each quarter to ensure they remain valid. It was agreed that deprioritisation of items 8 and 10 in 2020 was still the right approach.

Finally, board members agreed that it was important to communicate achievement of the Business Plan to the regulated community and other stakeholders, as part of providing ongoing assurance that the organisation is well run, has clear plans, and delivers against those plans. Kate agreed to include a piece on this in an upcoming newsletter.

Action: Begin reporting against the 2021 Business Plan at the April meeting.

3.2 Annual progress against performance indicators

The board was provided with a summary of progress against the metrics in the performance indicators document (PID) adopted in January 2020. The performance indicators were developed to help the board monitor the effectiveness of the CLSB's governance arrangements and track achievement of the mid-term strategy.

The board was asked for feedback on the progress made in 2020, as well as the ongoing relevance of the performance indicators. Kate recommended tweaking certain measures in 2021, as outlined in the report, but noted that overall she had found assessment against the PID to be a useful reflective exercise and suggested a similar approach be taken going forward.

The board discussed the report. In relation to the metric on accumulation of reserves, it considered whether the adjusted target date of 2025 was too far in the future. Board members acknowledged that the planned rate of contribution made it unlikely that the target would be reached before 2025. However, in the volatile environment created by COVID, there was an argument for making larger annual contributions to ensure the CLSB could take opportunities as they arose and respond adequately to external pressures. The board noted that the LSB's proposed new Practising Fee Rules – which could require the return of any underspend to the regulated community – would limit flexibility to make additional contributions in the future. Ultimately the board was satisfied that the £20k contribution in 2020 would help accelerate the rate of accumulation, and hoped the LSB would reconsider the restrictions in its Practising Fee Rules following consultation.

In relation to the business continuity metric, the board agreed that the organisation was in a very different place to when the PID was first drafted. This metric should be reframed to better reflect ongoing risks.

The board was provided with the results of a NED satisfaction survey that had been carried out to provide data for the governance metric relating to cultural alignment and accountability. It was agreed that the results would provide useful background for the board's upcoming strategy day. It was also agreed that the metric should be adjusted so that the survey was run annually.

The board agreed the other adjustments to the metrics suggested in the report.

Action: Update PID for 2021 and publish on website.

3.3 Education and competency

Kate provided the board with details of various developments relating to education, including:

- progress with ACL and ACLT on completion of the qualification audit under the new framework;
- confirmation that ACLT had taken on new students in 2021 and a report on provisional numbers;
- an update on governance and viability issues relating to the course;
- the appointment of Professor Carl Stychin as an independent education adviser to the CLSB;
- emerging plans for a project to create a new point-of-entry competency framework for qualifying Costs Lawyers, and feedback from discussions with various experts about this proposal;
- potential options and opportunities arising out of the above.

The board discussed these issues in detail. It was noted that obtaining the audit materials from ACL was taking significantly longer than anticipated. The board considered whether the issue should be escalated and decided that Kate could come back to the board as and when escalation became necessary.

The board strongly supported the proposal to develop a competency framework and board members offered to assist. The board discussed how the project should be approached. Andrew M noted that work on a competency framework had been done by ACLT several years ago and this might make a good starting point.

It was agreed that developing the competency framework would bring a variety of benefits and opportunities, such as:

- ensuring that competency requirements for newly qualified Costs Lawyers are transparent, up to date and relevant in the modern marketplace;
- creating more flexibility for course providers to adjust their content to meet student need and address market changes over time;
- providing a clearer framework for accrediting existing and new routes to entry;
- providing a robust evidence base for any rule changes that are required in the future;
- creating a foundation for developing other competency outcomes at different stages of a Costs Lawyer's career.

Board members felt that having one or more stable and accessible routes to entry is imperative for the CLSB, the profession and students, including for diversity and inclusion reasons. The competency framework would be a key aspect of ensuring this in the long term. Kate explained that a project plan was underway but not yet finalised. She agreed to circulate the plan to the board as soon as it was available so the project could commence in Q1.

Action: Circulate competency framework project plan out of meeting.

4. BOARD MATTERS

4.1 Appointment of incoming Chair

The interview panel for the Chair role (Andrew H, Paul and Kate) met with five exceptional candidates in November 2020 and unanimously recommended the appointment of David Heath. Following the board's prior indication by email that David should be offered the role, the board resolved to appoint David as Chair of the board from 18 March 2021 for an initial one year term, in accordance with the Board Appointment Rules.

Action: File notification of change with Companies House.

5. FINANCE

5.1 Quarterly report: Q4 2020

Jacqui introduced the quarterly finance report. She noted that, while there were significant variances from the original 2020 budget, which was produced in mid-2019, the final position was in line with more recent forecasts. The board considered the financial position at year end. The board agreed to transfer part of the budget surplus to reserves, by way of a £20k contribution rather than the budgeted £10k, in line with the Reserves Policy.

The finance report included feedback obtained from the accountants on the merits of obtaining charitable status. The report concluded that this was not worthwhile for the CLSB, despite some other regulators taking this approach, as the CLSB already benefits from many of the tax advantages of charitable status without the burden of additional regulation. The board agreed it was not necessary to pursue charitable status now, but this should be kept under review, particularly if any future CLSB initiatives had VAT implications.

Jacqui noted that work was underway to improve presentation of the finance report by better integrating annual expenditure and income (which is split across two years given the timing of the practising certificate renewal process). The board welcomed the approach and thanked Jacqui for improvements that had already been made to the management accounts during 2020.

In relation to creating a new Director of Policy role – as had been approved at the October meeting – Kate updated the board on the recruitment process and explained that it had become clear a more flexible model could bring numerous benefits given the CLSB's limited budget. To this end, she reported that the services of Lucerna Partners (a specialist regulatory policy consultancy) had been secured to provide targeted policy support during 2021, alongside the CLSB's existing consultants. The board supported the approach and welcomed the appointment.

Action: Effect £20k transfer to reserves.

5.2 Cost of living wage rise

The board considered the annual standing item of a pay rise across all employees to reflect the increasing cost of living. Projected inflation for 2021 was 1.2%, with inflation in 2020 also being reported as 1.2%. On this basis, the board approved a salary increase of 1.2% for all staff, implemented from 1 March 2021.

Action: Implement approved wage rise from 1 March 2021.

6. RISK MANAGEMENT

6.1 Review of risk registers

The board reviewed the risk registers and considered whether any new risks should be added, any existing risks removed or any risk scores changed. The board agreed to:

- update the controls around risk OP2 (*organisational structure not sufficient to ensure business continuity*) to reflect the policy support procured for 2021;
- close risk OP7 (*a no deal Brexit undermines regulatory structures*), due to successful implementation of post-Brexit regulatory arrangements (see Item 7.3).

In October, the board agreed that risk OP1 (*more leave than enter the profession*) should remain red, but that this should be revisited in the following quarter. Kate updated the board on the likely number of new qualifiers in 2021 and the expected rate of natural attrition, taking COVID and other factors (such as the age profile of the profession) into account. The final position for 2020 (taking into account terminations, reinstatements and new qualifiers up to year end) saw the regulated community contract by 11 Costs Lawyers. The expectation would be similar for 2021. On that basis, the board agreed OP1 should remain at the highest risk level.

The Non-Lay NEDs updated the board on a recent announcement that the government would be delaying implementation of the high-profile whiplash reforms until May. The board discussed the potential impact of the reforms on the costs market, particularly changes to the volume and complexity of instructions in low value PI claims, including a possible increase in the proportion of instructions from lay clients who had been unrepresented at earlier stages of substantive PI proceedings. The shifting client profile could increase risks around identifying client vulnerability and handling client money. The board agreed to add the reforms to the evidence of risk OP1 as well as risk R2 (*Costs Lawyer accepting client money*), but not to adjust the risk ratings until the likely impact became clearer. Andrew M agreed to speak with contacts in the market to get a wider perspective of impact.

Andrew M also reported an anecdotal rise in enquiries from lay clients in recent months, some of whom had been represented by a solicitor at earlier stages of proceedings and some of whom had been litigants in person throughout. The board discussed the potential for the risk profile of the profession to shift if the nature of instructions changed materially, but also noted opportunities for gathering more data about lay client needs and experience over time. The Non-Lay NEDs agreed to monitor this trend within their own networks and report back to the board. Statistics from the regulatory return would also be available in April, including new data on lay client instructions.

The board considered whether, in addition to removing risk OP7, other “green” risks should now also be removed. The board agreed to retain OP4 (*ACL becomes insolvent*) at least until the future of the qualification was more certain and ACL’s consultation on its membership structure had played out.

Finally, the board discussed new risks to competency and standards from the long-term adoption of home working during and after the COVID pandemic. Risks relating to supervision and training are often addressed at firm level, but as the CLSB does not

regulate entities, monitoring supervision systems is more difficult. The board agreed to update risk R1 (*standards set by CLSB do not achieve positive consumer outcomes*) to capture the increased risk. It was agreed that the issue should be addressed in the new guidance for employers of Costs Lawyers, which was a Business Plan priority for 2021. The guidance should be noted in the controls for risk R1.

Actions: Update risk registers as agreed and publish on website; Non-Lay NEDs to provide update on likely impact of whiplash reforms and shifting client profile at April meeting.

6.2 Coronavirus

The board discussed the ongoing impact of coronavirus on the profession and its clients. Paul and Andrew M provided feedback on the state of the market. The national lockdown has had a limited impact on professional services with good remote working systems already being in place across the costs market. Anecdotally, many firms are anticipating part-remote working carrying on after the pandemic ends. The main impact of the lockdown appears to be on mental health and wellbeing. Work levels are high across litigation generally, other than potentially in PI given the reforms discussed earlier.

The board considered the impact on the justice system generally and the risks this posed to the profession. Paul reported an increase in ADR given the delays experienced in certain types of litigation, which presented another opportunity for Costs Lawyers to assist clients in a different way.

In October, the board had agreed that the next coronavirus impact survey should be conducted in Q1 2021, with the precise timing and any additional questions to be agreed at this meeting. Given that the flow of work into the profession had largely settled and remote working had bedded in, the board felt it was the right time to run the survey again. Kate agreed to launch the survey in time for results to be analysed prior to the April board meeting. A question would be added around the likelihood of continuing with remote working in the longer term.

Action: Launch next coronavirus impact survey, including a new question on long-term remote working.

7. REGULATORY MATTERS

7.1 Case Manager guidance under the DR&P

Kate explained that, having implemented new Disciplinary Rules and Procedures (DR&P) and supporting documents in 2020, guidance for the newly created Case Manager role had been finalised in Q4 in line with the Business Plan.

The board scrutinised the proposed draft guidance. Board members discussed the ability to adjourn proceedings, including who would take this decision and whether a limit on adjournments should be imposed. It was noted that interim suspension orders could be used to protect the public, but that these could have punitive consequences. It was agreed that, ultimately, a decision on whether further adjournments should be permitted must remain at the discretion of the Conduct Committee with relevant factors being assessed on a case-by-case basis. Board members also queried whether funding should be made available for a Costs Lawyer involved in disciplinary

proceedings to be legally represented, particularly where the CLSB had an external advocate. It was noted that the DR&P would not disallow this and, again, it could be considered on a case-by-case basis if fairness required it.

The board approved the guidance for adoption.

Action: Update Internal Handbook with approved guidance.

7.2 Guidance note on ATE insurance

Kate explained that, having completed phase 2 of the Handbook audit in Q3 2020, she had begun to prioritise the remaining Handbook materials for review in line with the 2021 Business Plan. That exercise showed that the oldest piece of guidance – a guidance note on After the Event (ATE) insurance dating from 2014 – was now inaccurate. The guidance note was therefore withdrawn from the Costs Lawyer Handbook in November.

As the subject matter remained relevant, an updated guidance note was prepared in Q4. The board considered and approved the new guidance.

Action: Update Costs Lawyer Handbook with approved guidance note.

7.3 Recognition of European qualifications post-Brexit

Kate reminded the board that the CLSB is required by legislation to implement a regime for recognising the professional qualifications of certain foreign nationals who wish to practise as Costs Lawyers in England and Wales. Changes to that regime were required after the UK exited the EU, with amending legislation coming into force at the end of the transitional period (31 December 2020).

In October 2019, the CLSB had sought and obtained LSB approval for the implementation of new regulatory arrangements that would comply with the changes, as anticipated at that time. Kate informed the board that, in November 2020, the government passed a new SI containing a different (temporary) post-Brexit regime for the recognition of professional qualifications along with a transitional regime for Swiss nationals. BEIS guidance on the temporary regime was not available until early December.

Work had therefore accelerated in December to draft new regulatory arrangements and have them approved by the LSB under Exemption Direction 133 prior to 31 December. Kate reported that the new rules and application forms went live on the CLSB's Foreign Qualified Costs Lawyers webpage just before Christmas, along with guidance about how to apply for recognition.

The board was provided with the new Recognition of European Professional Qualifications Rules. Kate explained that, given the tight timescales, the Rules had to be implemented without the benefit of prior board scrutiny. The board was invited to comment on the Rules, on the understanding that an application to amend the Rules could still be made under ED133 until that instrument was withdrawn by the LSB.

The board discussed the Rules and, agreeing that no amendments were necessary, formally approved them.

7.4 Implementation of new CPD Rules

Kate explained that, in line with the agreed communications plan, the new CPD Rules were implemented in the first working week of the year. The main information hub for practitioners was now the CLSB's dedicated CPD webpage, which had been redeveloped for the launch. Kate conveyed the measures that had been taken to raise awareness of the changes and noted that a Virtual Q&A was scheduled for 3 February.

The Non-Lay NEDs provided feedback on how the changes had landed with their colleagues. They noted that they both worked in SRA-regulated firms, so the changes did not have a significant impact, but they would seek wider views. The board supported the use of different communication channels and welcomed the intention to adjust communications throughout the year in response to feedback received.

7.5 CMA review of market study recommendations

The board was provided with a summary of the CMA's conclusions from its review of its 2016 market study recommendations. Kate reported on the key findings and what they meant for the CLSB in the short and medium term.

The board discussed the findings, particularly around transparency and regulatory reform. The board noted that the report referred specifically to the difficulties faced by the CLSB in making rules on price transparency (given that it does not regulate entities) and appreciated the CMA's engagement on this issue during the evidence gathering process. Kate noted that work on quality indicators was currently being spearheaded by the SRA and CLC. The board agreed that the CLSB should collaborate on this work where it made sense to do so, but its involvement would inevitably be reactive given that few Costs Lawyer instructions come directly from lay consumers and SMEs (who are the main beneficiaries of quality indicators).

The board agreed that immediate next steps for the CLSB would depend to some extent on the areas of the report that were prioritised by the LSB as having sector-wide impact.

8. LEGAL SERVICES BOARD (LSB)

8.1 Updated regulatory assessment

The board was provided with the LSB's latest regulatory performance assessment from November 2020.

Kate reminded that board that the timing of the CLSB's assessment was out of synch with the other regulators. In August, the CLSB had moved from "amber" (not met – action being taken) to "green" (met) against five standards. The remaining four "amber" standards were not included in the November assessment. However, the LSB had sought further information in relation to two "green" standards – RA1 and S4 – as well as the new standard WL7 relating to independence from ACL. The board

welcomed the assessment, noting that a “green” assessment had been retained for each of RA1, S4 and WL7.

The board was also provided with a letter from the LSB explaining the November assessment, along with the LSB’s full assessment report covering all the regulators. The board discussed the CLSB’s positioning in the sector, as well as the future of the regulatory assessment and the perceived pros and cons of the existing framework. Overall, the board agreed that the most important comparison for the CLSB was between its own past, present and planned performance. The board was proud of what had been achieved since the initial transitional assessment in 2019 and was keen to continue making sustainable, meaningful progress over time.

Kate noted that the LSB expected significant progress to have been made against the remaining “amber” standards by 31 March and this would be a priority area of focus in Q1.

8.2 State of the nation report and strategy consultation

The board was provided with the LSB’s State of Legal Services 2020 report, along with a consultation on the LSB’s mid-term strategy for legal services regulation and 2021-22 Business Plan. Kate summarised the key themes, focus areas and intended projects.

Kate explained that she would be engaging in two events relating to the report and consultation in the coming weeks, which would allow the CLSB to take a view on whether it needed to provide a written response to the consultation.

The board discussed the consultation, including the LSB’s proposed 4.4% budget increase. The board focused particularly on the LSB’s proposal not to review the list of reserved legal activities, as recommended by the CMA. This was disappointing for the Costs Lawyer profession and the board felt the issue warranted more immediate attention. It was agreed that Kate should raise this during the stakeholder events.

8.3 Other workstreams

Kate reported that publication of the LSB’s new Practising Fee Rules had been delayed and these were now expected to be available in late January.

Kate also provided feedback on a seminar hosted by the LSB for the CEOs of the regulators to discuss the LSB’s approach to oversight regulation. The board was provided with a letter from Matthew Hill following up on issues raised in that discussion. The board noted the concerns of the various regulators that had been raised in that forum.

9 STAKEHOLDER UPDATES

9.1 ACL Council meeting minutes

The board discussed the minutes of ACL Council meetings held in September and November 2020. Board members noted that limited progress had been made on a number of key issues. The Non-Lay NEDs had contacts on the Council, which might provide a useful board-level touchpoint to help the CLSB understand the barriers to pushing certain issues forward.

Section 4 of the November minutes was of particular interest, as it provided some indication of ACL's current thinking around increasing membership and student numbers. It was noted that the promised consultation on those issues had not yet been received from the ACL Chair.

9.2 Work updates

Updates were provided in relation to:

- a presentation given by Kate at a recent ACL Legal Aid Group seminar on regulatory priorities and the (then upcoming) CPD changes;
- the Legal Ombudsman's (LeO's) consultation on its budget and business plan;
- difficulties with a LeO determination relating to jurisdiction in a complaint against a Costs Lawyer who worked in an unregulated firm.

The board discussed how the last item highlighted that the current poor service quality and delays within LeO were having a real impact on consumers of costs services. It also showed a lack of understanding within LeO of the regulatory framework applying to Costs Lawyers in unregulated businesses.

The board agreed that Kate should make contact with LeO about refresher training on aspects of the Costs Lawyer market, but not until LeO has stabilised the scheme and reduced staff turnover. The board reiterated the importance of a well-functioning route for the resolution of disputes, not least as a differentiating factor between the regulated and unregulated parts of the costs market.

10 OPERATIONAL MATTERS

10.1 Review of practising certificate renewals process

Jacqui reported that the new online process for practising certificate renewals was successfully implemented in November. The board was provided with a comprehensive report assessing the new process against five key measures (cost, resource implications, user feedback, data security and data quality). The report also provided statistics on the level and nature of renewals and terminations for the year.

The board congratulated the team on the success of the project and discussed the risks, controls and next steps identified in the report. The Non-Lay NEDs reported that the process was much easier to navigate than previously. The board was particularly pleased to see that the new process had brought the organisation closer to the profession in discrete and unforeseen ways. The board also hoped the process had improved the perception of the CLSB as a modern and forward-looking regulator.

Overall, the board felt it was a significant achievement to take the new process from conception to implementation in under a year, and thanked Jacqui for her diligence in thinking through the operational aspects. The board approved the follow-up work for 2021 as outlined in the report.

11 PUBLICATION

11.1 Confirmation that papers can be published

The board agreed that all board papers for the meeting should be published, other than those noted on the agenda for the reasons stated.

Action: Publish board papers on website in accordance with agenda notations.

12 AOB

On behalf of the board, Stephanie conveyed her thanks to Steve for his many years of dedicated service to the CLSB – this being his last meeting as Chair – and reflected on Steve’s successes in leading the organisation over seven years. Kate passed on a message of thanks and well wishes from the former Vice Chair of the board, Gillian Milburn.

13 NEXT SCHEDULED QUARTERLY MEETING

When: Wednesday 21 April 2021 at 10.30am

Where: TBC

There being no further business, the Chair declared the meeting closed.

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Chair

Related documents

Item	Document	Publication location (CLSB website)
2.1	Board minutes (20 October 2020)	About us ⇨ Our board
3.2	Performance Indicators updated for 2021	About us ⇨ Strategy and governance
4.1	Incoming Chair biography	About us ⇨ Our board ⇨ Individual board members
6.1	Risk registers	About us ⇨ Strategy and governance
7.2	Guidance note on ATE insurance	For Costs Lawyers ⇨ Costs Lawyer Handbook
7.3	Recognition of European Professional Qualifications Rules	For Costs Lawyers ⇨ Foreign qualified Costs Lawyers
7.4	CPD webpage	For Costs Lawyers ⇨ CPD
Item	Document	Publication location (other)
7.5	CMA review of market study recommendations	Government website here
8.1	Updated regulatory performance assessment (November 2020)	LSB website here
8.2	State of Legal Services 2020 report	LSB website here
8.2	Strategy and business plan consultation	LSB website here
9.2	Business plan and budget consultation	LeO website here