

Encouraging a diverse legal profession

Annex A: Draft statement of policy to encourage a diverse legal profession

27 November 2025

Draft statement of policy to encourage a diverse legal profession

Issued under section 49 of the Legal Services Act 2007

Purpose of this document

1. This statement of policy is issued under section 49(2) of the Legal Services Act 2007 ('the Act') and in preparing it, the Legal Services Board ('LSB') has had regard to the principle that its principal role is the oversight of approved regulators under section 49(3) of the Act. We oversee the approved regulators, some of which have delegated their regulatory functions to independent regulatory bodies ('regulators'). We are independent of both Government and the profession.
2. The purpose of this statement of policy is to set outcomes and expectations of the regulators, in the interests of the public and consumers, to encourage a diverse legal profession. Regulators are expected to pursue the outcomes by meeting the core expectations and, where appropriate, the enhanced expectations.¹ Table A (below) maps out the desired results we aim to achieve through this statement of policy.
3. Under the Act, the LSB and the approved regulators must, so far as is reasonably practicable, act in a way which is compatible with and which they consider most appropriate for, meeting the regulatory objectives. While being relevant to all regulatory objectives, this statement of policy is particularly relevant to the objective to encourage an independent, strong, diverse and effective legal profession, as well as:
 - Protecting and promoting the public interest
 - Improving access to justice
 - Protecting and promoting the interests of consumers
 - Promoting competition in the provision of services
 - Promoting and maintaining the adherence to the professional principles.
4. The LSB will have regard to this statement of policy in exercising its functions, in particular:
 - a. the maintenance and development of standards for the regulation by approved regulators of persons they authorise to carry out reserved legal activities (section 4(a) of the Act);
 - b. education and training of persons so authorised (section 4(b) of the Act);
 - c. applications for approval of alterations to regulators' regulatory arrangements in accordance with Part 3 of Schedule 4 to the Act; and
 - d. enforcement functions under sections 31 to 45 and section 76 of the Act.
5. The LSB will also have regard to regulators' compliance with this statement of policy in discharging its other oversight functions, including in its assessment of regulators under the regulatory performance assessment framework.

¹ Paragraph 27 of this statement of policy sets out the factors regulators should consider when taking a decision on whether it is appropriate to pursue the enhanced expectations.

6. In discharging its functions, the LSB must, so far as is reasonably practicable, act in a way which is compatible with the regulatory objectives and which it considers most appropriate for meeting those objectives.²
7. In developing this statement of policy, the LSB has had regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed, under section 3(3)(a) of the Act.
8. Section 21 of the Act also expressly provides that several types of regulatory arrangements may extend to ‘regulated persons’, which includes both authorised persons and those who are not so authorised but are employees of a person who is (this includes employees who are managers of authorised firms). The LSB accordingly expects regulators to take account of such individuals when pursuing the outcomes set out at paragraph 21.
9. The provisions of the Act and any rules made under those provisions will prevail over this statement of policy. The LSB may review this statement of policy and issue a revised version if its policy changes.³

The case for regulatory intervention

10. Despite efforts in the sector, the legal profession in England and Wales is still not representative of the public that it serves.⁴ Barriers in the legal profession persist and, in some cases, have increased in prevalence and effect. Our review of the evidence highlights many of the critical barriers.⁵
11. While there are barriers, there are also opportunities. For example, there is a significant opportunity to leverage the growing recognition of regulators’ role in shaping a more diverse legal profession. A 2021 review of regulatory efforts to encourage a diverse profession, commissioned by the LSB and undertaken by the Bridge Group, shows that some regulators have taken steps such as monitoring data, research, issuing guidance, and embedding relevant standards into professional duties.⁶ However, this and successive reviews of regulators’ measures suggest that these efforts are often in isolation, not robustly evaluated, and too slow to bring about the improvements needed to encourage diversity in the profession.
12. There is now an opportunity to move from isolated efforts to more strategic, consistent, and evidence-based approaches. In addition, by strengthening evaluation and

² Legal Services Act, s 3(2)

³ The LSB’s “Guidance for legal services regulators on encouraging a diverse workforce” (February 2017) under s162 of the Legal Services Act will be withdrawn, as will the 2020 clarification document, to coincide with issuing this statement of policy.

⁴ See the LSB’s Diversity Dashboard, which sets out the latest diversity data from across the legal profession, (collected and reported on by the legal services regulators) and benchmarks this data against national statistics: <https://legalservicesboard.org.uk/research/diversity-dashboard-0>.

⁵ For a recent literature review of barriers to encouraging a diverse legal profession, see <https://legalservicesboard.org.uk/wp-content/uploads/2024/08/Mapping-Systemic-Barriers-to-EDI-in-the-Legal-Professions-Final-1.pdf>. Our consultation provides a comprehensive discussion on the evidence base, which shows ongoing diversity gaps in the profession and persistent barriers to encouraging diversity.

⁶ <https://legalservicesboard.org.uk/wp-content/uploads/2021/05/Bridge-Group-Legal-Regulation-Literature-Review.pdf>.

addressing unintended harms within regulatory processes, regulators can more effectively use their influence to remove barriers and support lasting progress.

13. A diverse and inclusive legal profession is also essential for public trust, improved consumer outcomes, and economic growth. Greater diversity enhances problem-solving, innovation, and organisational resilience, while poor wellbeing and exclusion carry significant financial and reputational costs. Replacing the existing guidance with a strengthened regulatory approach will enable the sector to dismantle barriers, harness the benefits of diversity, and ensure a sustainable, effective profession aligned with societal needs.
14. A diverse legal profession is underpinned by both equality (of opportunity, in professional practices, and regulatory processes) and a supportive environment. Therefore, this statement of policy reflects not only the importance of advancing equality of opportunity but also promoting healthy and inclusive professional environments by using regulatory levers.⁷
15. Based on our reviews of regulators' approaches and our thorough analysis of the evidence base, we have determined that a statement of policy is necessary to provide a clearer and more effective oversight regulatory framework that will encourage and support regulators to meet the regulatory objectives.

Outcomes

16. The LSB aims to create a strong but flexible framework that supports regulators to take meaningful action on diversity and to comply with their related statutory obligations, as set out in the Act. At the same time, it recognises that each regulator operates in a different context. Therefore, unless stated otherwise, the outcomes in this statement should be pursued by each regulator in a way that reflects the specific risks within and needs of their regulated community.
17. The barriers to achieving a diverse legal profession are long standing and clearly evidenced across the sector. Changes to systems and cultures that underpin the legal profession will require holistic, collective and systematic approaches over time. Therefore, we have developed a timeframe to set out the desired results of this statement of policy over the short, medium, and long term. This is intended to help regulators build strong foundations, track progress, and achieve lasting impact toward a more diverse profession. Table A describes the desired results we aim to achieve through the statement.
18. The outcomes are shaped by both the evidence on key barriers and the levers available to regulators, from their internal practices and approaches to their formal regulatory responsibilities for the conduct and competence of authorised persons (including authorised firms) and education and training routes into and through the profession.
19. We also recognise that working collaboratively with others in the sector is key to achieving sustainable change in the profession, particularly where non-regulatory

⁷ The centrality of equality in how public bodies and public authorities dispensing public functions is clearly set out in the Equality Act 2010's Public Sector Equality Duty, with which the LSB and the regulators must comply.

solutions are needed to complement and support formal regulatory actions. This statement of policy, therefore, sets expectations for regulators to work in partnership with others, where this can support regulators to pursue the outcomes, the regulatory objectives, and ultimately lead to greater impact. Acting across all these spheres of influence is essential to driving meaningful and sustained change.

20. In pursuing the outcomes, regulators are obligated under section 28(3) of the Act to have regard to the principles under which regulatory activities should be transparent, accountable, proportionate, consistent and targeted only at cases in which action is needed. Regulators should have regard to these same principles and any other principle that represents best regulatory practice, as the LSB has had in creating this statement of policy.

21. Regulators are expected, taking account of their regulatory context, to pursue the following outcomes to encourage a diverse legal profession:

- **Outcome 1: Regulators take strategic, evidence-based and collaborative actions to encourage a diverse legal profession;**
- **Outcome 2: Regulators take effective steps to ensure regulatory approaches, processes and decision-making support equality and fairness and do not undermine efforts to encourage a diverse profession;**
- **Outcome 3: Regulators support fair, flexible, and accessible pathways into, within and back into the professions that encourage a diverse legal profession; and**
- **Outcome 4: Regulators ensure their frameworks effectively support authorised persons to uphold professional conduct, behaviours, and competencies that encourage a diverse legal profession.⁸**

Core and enhanced expectations

22. To enable regulators to proportionately pursue these outcomes while, at the same time, seeking to ensure that regulators are targeted, transparent, accountable and consistent in their activities, the LSB has developed two sets of expectations which underpin the outcomes.

23. Firstly, this statement of policy provides a set of **core expectations** under each outcome. These represent the fundamental requirements that all regulators **must** meet

⁸ As per section 18 (1) of the Legal Services Act 2007, 'authorised person' refers to both 'a person who is authorised to carry on the relevant activity by a relevant approved regulator in relation to the relevant activity (other than by virtue of a licence under Part 5 of the Act)' and any 'licensable body which, by virtue of such a licence, is authorised to carry on the relevant activity by a licensing authority in relation to the reserved legal activity.' Therefore, the competencies, behaviours and conduct of authorised firms are expected to be considered in pursuing this outcome. Currently, not all regulators have the statutory responsibility for regulating firms. The statement, therefore, qualifies any expectation related to authorised firms in a way that ensures relevant expectations are applied only where applicable.

to ensure consistent, credible, and meaningful regulatory action to encourage diversity in the legal profession.

24. Regulators are expected to pursue the outcomes by meeting the core expectations. However, regulators have discretion to take alternative steps to pursuing the outcomes to the expectations set out in this statement of policy, where they have clear evidence and reasons for why their proposed alternatives are more appropriate within their specific regulatory context to pursuing the outcomes.
25. Secondly, this statement of policy includes a set of **enhanced expectations** which regulators **should also consider** meeting. These expectations are evidence-informed measures that build on the core expectations and are designed to assist regulators in demonstrating leadership within and beyond the legal sector, driving innovation and supporting continuous improvement in meeting the regulatory objectives.
26. The enhanced expectations recognise that barriers to diversity in the legal profession are long-standing and will require regulators to collaborate with partners and stakeholders both within and outside of legal regulation. By engaging with the enhanced expectations, regulators can increase their impact, contribute to long-term, sector-wide progress and help shape the cultural and behavioural change needed to make that progress sustainable.
27. The extent to which individual regulators consider meeting the enhanced expectations will depend on both the specific risks and opportunities relevant to them and their regulated professions. This could include but would not be limited to evidence of stagnant or slow progress, evidence of a need for greater intervention to tackle more complex barriers, and/or where regulators have determined additional action is needed in pursuit of the outcomes. In circumstances where a regulator has taken steps to meet the core expectations, yet barriers to a diverse legal profession persist, then it should consider meeting the enhanced expectations.
28. The expectations under the four outcomes in this statement of policy are subject to relevant data protection requirements.

Outcome 1: Regulators take strategic, evidence-based and collaborative actions to encourage a diverse legal profession

29. Core expectations for Outcome 1

In pursuing Outcome 1, regulators **must**:

- I. Have effective, high-quality data monitoring processes⁹ in place to support a clear and thorough understanding of the diversity profile of the regulated community over time and where greater diversity needs to be encouraged.¹⁰ The collection and publication of diversity data should be undertaken at an appropriate frequency determined by each regulator;¹¹
- II. Take additional appropriate and proportionate steps, beyond those in place to meet 29.I, to identify barriers and opportunities to encouraging diversity in the regulated community, e.g., by undertaking research and/or further quantitative and qualitative data collection¹² and targeted engagement with the profession and other relevant groups;¹³
- III. Produce and implement a strategic action plan that addresses the challenges and opportunities to encouraging a diverse profession within the regulator's specific regulatory context and regulated community, using an appropriate regulatory framework.¹⁴ At a minimum, this action plan must:
 - a. apply data and evidence developed through, for example, activities designed to meet 29.I and 29.II;

⁹ The LSB's definition for quality in relation to data is aligned with that set out by the Government Statistical Service (GSS). The GSS suggests that quality is related to how well outputs meet user needs and applies the European Statistical System's (ESS) 'quality dimensions' to determine how successful outputs are in achieving this: relevance, accuracy and reliability, timeliness and punctuality with regards to publication, accessibility and clarity, and coherence and comparability. We expect, therefore, that regulators will consider these quality dimensions in the design and implementation of diversity data monitoring processes to ensure these are robust, timely, transparent and relevant to meeting user needs. See, <https://analysisfunction.civilservice.gov.uk/policy-store/government-statistical-service-gss-quality-strategy/#appendix-b-what-is-quality->.

¹⁰ Although the LSB expects regulators to collect, at a minimum, data based on the protected characteristics as set out in the Equality Act, as well as data on socio-economic background, we strongly encourage regulators to consider collecting data for diversity characteristics beyond those reflected in the nine protected characteristics of the Act, as the regulator sees fit and proportionate and where relevant to the context of its regulatory community. In identifying the most appropriate indicators for measuring socio-economic background (SEB) data, regulators may wish to consult guidance developed by both the Social Mobility Commission and the Government Analysis Function: <https://socialmobility.independent-commission.uk/> and <https://analysisfunction.civilservice.gov.uk/policy-store/socio-economic-background-harmonised-standard/>.

¹¹ Response rates for some protected and other diversity characteristics remain low across regulated professions and there are some challenges in building a full and coherent profile of the legal profession. The LSB, therefore, strongly encourages regulators to consider the most efficient and effective way to capture diversity data from regulated communities. Regulators should consider how diversity data could be collected most effectively in a way that encourages authorised persons to share accurate and up-to-date data with regulators. Regulators should also, as far as reasonably practicable, use data collection to understand how different aspects of a person's identity—such as ethnicity, sex, disability, and more—combine and interact to create unique barriers.

¹² Where it is not feasible for regulators to undertake their own research and evidence building to meet this expectation, we expect them to consult data and evidence available from other sources, including regulators, representative bodies and any other relevant organisations.

¹³ Barriers could include, for example, fairness in firm recruitment and promotion processes; progression and retention barriers in the profession faced by any groups; bullying, harassment and misconduct (including, but not limited to, sexual misconduct); poor mental health and wellbeing; barriers to disability inclusion; and pay gaps and disparities in work distribution. As per footnote 11, the LSB encourages regulators, as far as reasonably practicable, use data collection to understand how different aspects of a person's identity—such as ethnicity, sex, disability, and more—combine and interact to create unique barriers.

¹⁴ The regulator is best placed to determine whether the strategic action plan is published as a standalone plan or whether it sits within a wider organisational strategy.

- b. outline the regulator’s goals designed to pursue the outcomes in this statement to encourage a diverse legal profession;
 - c. set out key risks to diversity in the profession and how these will be managed;
 - d. provide a clearly defined, timebound and measurable plan for achieving goals (as per 29.III.b), including specific evidence-informed interventions and appropriate evaluation approaches;
 - e. be overseen by the appropriate governing body, which must receive regular reports on progress;
 - f. be published, reported on and updated as appropriate; and
- IV. Collaborate with others to help achieve goals to encourage a diverse profession, e.g., through harmonising data collection processes and approaches to enhance understanding of and benchmarking for diversity across the legal profession.¹⁵

30. Enhanced expectations for Outcome 1

In pursuing Outcome 1, regulators **should also consider**:

- I. Identifying and undertaking further measures to support the regulator’s understanding of emerging and potential future barriers and opportunities to encouraging diversity in the profession (e.g., the impact of technology and innovation developments, changes in the needs of consumers and those requiring access to legal services, and wider demographic changes that are likely to affect the diversity of the profession); and
- II. Including the following additional elements within strategic action plans (as per 29.III) to encourage diversity in the legal profession:
 - a. goals that are anchored in a clear theory of change;
 - b. stretching and outcomes-based numerical targets for activities;
 - c. clear lines of accountability and responsibility within the regulator for the strategy and programmes of work as well as evidence of internal capabilities to support them (e.g. resources, skills, training);
 - d. a programme for both process and impact evaluation that is underpinned by clear, and measurable indicators and metrics to demonstrate impact and is used to adapt the regulator’s activities to encourage diversity;
 - e. clear steps for involving authorised persons and others with relevant expertise and experience in the development of new, or the revision of existing regulatory activities, as relevant to diversity in the profession; and
 - f. action steps to support effective practice within the regulated community, e.g., by disseminating findings from a variety of sources, including the regulators own intervention and evaluation activities and evidence from other organisations within and outside the legal sector such as government agencies, representative bodies, and relevant interest groups.

¹⁵ As per the Government Statistical Service’s guidance, harmonisation refers to efforts taken to improve the consistency, comparability and coherence of data and statistics. Unlike ‘standardisation,’ harmonisation recognises that it is not always possible to produce completely aligned data and statistics for a specific topic, e.g., diversity. Harmonisation might include using consistent definitions and survey questions in data collection; improving understanding of how data and statistics can be combined; presenting data in a comparable and coherent way; providing guidance where consistency is not appropriate, allowing for more reliable presentation and analyses of diversity data by regulators across the legal professions. See, <https://analysisfunction.civilservice.gov.uk/government-statistical-service-and-statistician-group/gss-support/gss-harmonisation-support/>.

Outcome 2: Regulators take effective steps to ensure regulatory approaches, processes and decision-making support equality and fairness and do not undermine efforts to encourage a diverse profession

31. Core expectations for Outcome 2¹⁶

In pursuing Outcome 2, regulators **must**:

- I. Take steps to effectively identify and address any impacts on protected and other relevant diversity characteristics (including socio-economic background) that may arise from new or updated regulatory policies or actions;
- II. When formally consulting, provide external stakeholders with equality impact assessments to support informed feedback, to demonstrate how equality considerations have been considered, and, where needed, to seek further evidence and insights from stakeholders to inform policy development; and
- III. Take steps to effectively support fair disciplinary and enforcement processes by:
 - a. supporting disciplinary panel members and staff to make well informed, balanced and evidence-based decisions, by providing appropriate training and guidance that helps minimise bias and promotes consistency.¹⁷
 - b. regularly collecting and analysing data across all stages of disciplinary and enforcement processes to help identify patterns or risks of inconsistent or unfair outcomes;
 - c. identifying causes behind inconsistent and/or unfair outcomes and publishing clear and measurable remedial plans; and
 - d. appropriately supporting the wellbeing of authorised persons involved in investigations and/or disciplinary actions, including both complainants and respondents.¹⁸

¹⁶ Given the critical nature of pursuing fair processes and decision-making in regulatory practices, we deem the expectations proposed under Outcome 2 to be core expectations that must be met by all regulators. This is because the core expectations are all fundamental to the pursuit of fair regulatory approaches and decision-making. This should ensure a consistent approach across all regulators. However, we encourage responses to our consultation that identify suitable enhanced expectations that can support the pursuit of this outcome which regulators should also consider adopting.

¹⁷ Regulators should consider delivering appropriate mandatory and voluntary training that best supports practice and decision making in disciplinary and enforcement procedures. This could, for example, include vulnerable witness training and trauma-informed practice training for panel members, staff and any other relevant party involved in the decision-making process. For a definition and description of the principles of a trauma-informed approach, see: <https://www.gov.uk/government/publications/working-definition-of-trauma-informed-practice/working-definition-of-trauma-informed-practice>.

¹⁸ This could include, for example, referring complainants and respondents to independent support services, appointing witness liaison officers to support both complainants and respondents, and/or providing regular updates on the progress of cases to both complainants and respondents.

Outcome 3: Regulators support fair, flexible, and accessible pathways into, within and back into the professions that encourage a diverse profession

32. Core expectations for Outcome 3

In pursuing Outcome 3, regulators **must**:

- I. Ensure that training routes to qualification, approved by the regulator, are designed to support equality of access to, and encourage diversity within, the profession, while maintaining appropriate professional standards for entry into the profession;¹⁹
- II. As applicable, set and monitor specific standards for authorised training, qualification, and/or assessment providers²⁰ that support the regulator's goals to encourage a diverse profession;²¹ and
- III. Make information publicly available so that candidates can make informed decisions about their training, qualification, and assessment options. At a minimum, this must include education, training and examination costs, as well as qualifying course and examination outcomes.

33. Enhanced expectations for Outcome 3

In pursuing Outcome 3, regulators **should also consider**:

- I. Where appropriate, publishing outcomes for qualifying courses and examinations, disaggregated by relevant diversity characteristics. This should be done in a way that complies with data protection regulations and supports meaningful interpretation;
- II. Collecting and publishing data on authorised persons' education and training backgrounds (e.g., chosen route to qualification, training providers and courses attended) to identify any steps regulation could take, whether independently or in collaboration with key relevant partners, to effectively encourage greater diversity in the routes to qualification, as well as pathways between the legal professions; and
- III. Where applicable, encouraging and supporting authorised firms to develop, in partnership with education and professional training providers, work placement, internship and other relevant training programmes designed to encourage the diversity of the profession and to foster learning environments which promote wellbeing and inclusive behaviours.

¹⁹ Regulators are expected to consider how any activity undertaken to pursue Outcome 3 is compatible with the LSB's statutory guidance on regulatory arrangements for education and training:

https://legalservicesboard.org.uk/what_we_do/regulation/pdf/20140304_LSB_Education_And_Training_Guidance.pdf.

²⁰ Where 'authorised provider' is used in this statement of policy, it refers to any education and training body and/or employer formally authorised or intending to be formally authorised by the regulator to administer legal training to trainee legal professionals, as well as any third-party body appointed by or seeking to be appointed by the regulator to provide education, training and/or examination services for those seeking to be admitted to the legal profession on the regulator's behalf.

²¹ This could include, for example: standards on creating and safeguarding inclusive training environments; on taking effective action to making reasonable adjustments for individuals; on supporting trainees to develop appropriate competencies relevant to equality, diversity, wellbeing and inclusive environments in the profession; and/or on ensuring fairness in assessment methodologies.

Outcome 4: Regulators ensure their frameworks effectively support authorised persons to uphold professional conduct, behaviours, and competencies that encourage a diverse legal profession

34. Core expectations for Outcome 4

In pursuing Outcome 4, regulators **must**:

- I. Have and appropriately monitor a clear duty in relevant regulatory codes of conduct for all authorised persons to not bully, harass, victimise or discriminate against others and to treat those with which they engage fairly and with dignity and respect;
- II. Have and appropriately monitor an additional standard for managers of authorised and regulated persons²² to effectively encourage and support a fair, healthy and inclusive professional environment that values diversity and to challenge any behaviour that contravenes the relevant duty designed to meet 34.I;
- III. Use practical guidance and/or other resources (e.g., case studies) to support authorised persons and managers of authorised and regulated persons to understand and uphold the relevant duty and standards designed to meet 34.I and, where applicable, 34.II, respectively; and to support authorised firms to deliver commitments to encouraging a fair, healthy and inclusive professional environment that values diversity, particularly where challenged (e.g., by client, commercial or other demands);
- IV. Support authorised persons and, where applicable, regulated persons in authorised firms, to identify available channels to raise concerns about conduct deemed to pose a risk to a fair, healthy and inclusive professional environment (e.g., helplines and other platforms facilitated by representative bodies, voluntary and other relevant organisations) and, where a case is likely to be a breach of regulatory standards, to the regulator itself;
- V. Have and appropriately monitor clear competence frameworks²³ for authorised persons that require them to develop and demonstrate, at the point of authorisation and throughout their careers, relevant and appropriate knowledge and skills in encouraging equality, valuing diversity and advancing healthy and inclusive professional environments;²⁴
- VI. Have and appropriately monitor additional competence standards for managers of authorised and regulated persons²⁵ to ensure that they possess core skills required to manage in a fair, compassionate and inclusive way and to respond to the individual needs and circumstances of those they manage;²⁶

²² Managers refer to any authorised person with responsibilities for managing both authorised persons and 'regulated persons,' i.e., those who are not so authorised but are employees of a person who is (and this includes managers of authorised firms).

²³ Post-qualification standards should be made in line with the expectations set out in the LSB's ongoing competence statement of policy: <https://legalservicesboard.org.uk/wp-content/uploads/2022/07/Final-OC-statement-of-policy-July-2022.pdf>.

²⁴ For example, training to support authorised persons to understand and meet relevant legal and regulatory obligations, to conduct reflective practice, to act as active bystanders in relation to instances of bullying, harassment and other forms of behavioural misconduct, and to understanding, avoid and responding to bias and behaviours in the profession that pose a risk to encouraging a diverse and inclusive profession.

²⁵ As defined in footnote 22.

²⁶ For example, eliminating unlawful discrimination and encouraging equality in processes and decision making (including recruitment and promotion), preventing and responding to behavioural misconduct such as bullying, harassment and victimisation, and taking practical steps to encourage a healthy and inclusive culture for all.

- VII. Where applicable,²⁷ set a requirement for authorised firms to have a clear understanding of the diversity profile of their workforce (at all career stages), to have a thorough understanding of wellbeing and conduct challenges, and to take remedial action to address any evidenced disparities, reporting data and plans on these to the regulator on request; and
- VIII. Where applicable,²⁸ encourage and support authorised firms to design, publish and communicate, implement and monitor formal workplace policies that effectively advance equality and encourage diversity in the workforce through workplace processes and practices and create and sustain safe, inclusive, and healthy workplace and professional environments.

35. Enhanced expectations for Outcome 4

In pursuing Outcome 4, regulators **should also consider**:

- I. Where applicable,²⁹ encouraging and supporting authorised firms, to encourage diversity in leadership, as well as the practice of inclusive leadership. This could include, for example:
 - a. undertaking appropriate training and skills building;
 - b. making sure the practice is appropriately incentivised and measured;
 - c. ensuring leaders model and embed principles of fairness, respect, wellbeing and inclusion in everyday behaviours and organisational culture;
 - d. empowering all employees to deliver on organisational objectives for advancing equality, encouraging diversity, and promoting wellbeing and inclusive professional cultures; and
- II. Where applicable,³⁰ encouraging and supporting authorised firms to develop and implement evidence-informed strategic plans to encourage fair, diverse, healthy and inclusive environments in the workplace and in professional settings. Such plans may, for example, include measures to:
 - a. support workplace infrastructure that is inclusive and accessible to disabled individuals and other relevant groups;
 - b. explore and test innovative models of performance measurement e.g., values- and outcomes-based models that promote collaboration and collective working partnerships within and, across teams; and
 - c. consider the appropriate use of positive action, as set out in sections 158 and 159 of the Equality Act 2010, to meet equality of opportunity and diversity aims.³¹

²⁷ As per footnote 8, we use 'where applicable' to denote that expectations relevant to authorised firms are relevant only to those regulators that have regulatory responsibilities for authorised firms.

²⁸ Ibid.

²⁹ Ibid.

³⁰ Ibid.

³¹ For further information, see: <https://www.gov.uk/government/publications/positive-action-in-the-workplace-guidance-for-employers/positive-action-in-the-workplace>.

Table A –Statement of policy desired results

Short-term results to be achieved through the statement of policy (2-3 years)	Medium-term results to be achieved through the statement of policy (3-5 years)	Longer-term results (7-10 years) ³²	Ultimate vision
<p>Regulators:</p> <ul style="list-style-type: none"> • Have robust, high-quality evidence-building and analytical approaches • Implement effective evidence-driven strategic approaches • Work in effective collaboration • Fair approaches, processes and decision-making that do not undermine efforts to encourage a diverse profession • Proactively encourage fair, flexible and accessible professional pathways • Have and monitor clear conduct and competence standards in the profession • Effectively support and monitor compliance and address non-compliance, where this arises • Encourage and support authorised firms to be strategic in approaches, and encourage diverse and inclusive leadership 	<ul style="list-style-type: none"> • Reduced barriers to routes into and through the profession • Qualifying routes and providers encourage greater diversity in the professional pipeline • Strengthened professional conduct and competence standards in equality, diversity, wellbeing and inclusion • Enhanced organisational leadership and strategy to encouraging diversity in the sector • Managers of people are more knowledgeable in encouraging equality, diversity, inclusion and wellbeing • Strengthened routes to raise and respond to conduct that poses a risk to a fair, diverse, healthy and inclusive profession • Regulated communities are supported to safeguard commitments to encouraging an equal, diverse, and inclusive profession, including where challenged 	<ul style="list-style-type: none"> • Fair and accessible routes into and through the legal profession • Inclusive and healthy professional cultures and workplaces in law • Diversity that truly reflects the public, at all levels of the profession 	<p style="text-align: center;">An equal, diverse and inclusive legal profession that delivers effectively for consumers and in the public interest</p>

³² The results outlined in longer term vision and the ultimate vision will likely require further and ongoing action, including non-regulatory solutions beyond the statement of policy. This would include collaborative and collective efforts across the sector, with the LSB and the regulators we oversee playing a critical part as leaders in the sector.