

# Encouraging a diverse legal profession

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**A public consultation on the LSB's proposed statement of policy**

27 November 2025

This consultation will close at **14.00 on 2 March 2026**.

## About the Legal Services Board (LSB)

The LSB oversees the regulation of legal services in England and Wales. We are independent of both government and the legal profession. [The Legal Services Act 2007](#) (the Act) established the LSB on 1 January 2009, and we took on most of our statutory powers and duties on 1 January 2010.

We monitor the performance of the regulators for the different branches of the profession to ensure they meet expected standards. Our oversight of the regulators is designed to ensure that they have the competence, capability and capacity to promote the [regulatory objectives](#), always in the interests of the public and free from undue influence of the professions.

The regulators we oversee are:

- Solicitors Regulation Authority (SRA)
- Bar Standards Board (BSB)
- CILEx Regulation (CRL)
- Intellectual Property Regulation Board (IPReg)
- Council for Licensed Conveyancers (CLC)
- Costs Lawyer Standards Board (CLSB)
- Master of the Faculties (FO)
- Institute of Chartered Accountants in England and Wales (ICAEW).

We also have responsibilities in relation to the Office for Legal Complaints (OLC) – the Board of the Legal Ombudsman (LeO) – which resolves service complaints about legal services professionals. The Act also provides us with some powers in relation to the Solicitors Disciplinary Tribunal (SDT) and requires it to obtain the LSB's approval of its annual budget and for changes that it wishes to make to its rules.

We are publicly funded, although our costs are recovered from a statutory levy on the approved legal regulators. They in turn derive their funding from fees paid by the profession.

We promote the public interest by applying the [better regulation principles](#). This ensures our activities are always transparent, accountable, proportionate, consistent and targeted.

Our core organisational behaviours of leading, innovating, transforming and communicating underpin and guide our work.

More information about our role, responsibilities and activities can be found at [www.legalservicesboard.org.uk](http://www.legalservicesboard.org.uk).

## Foreword

A legal profession that reflects the society it serves is fundamental to the public interest. It builds trust, improves outcomes for consumers, and strengthens the sector's contribution to the economy. Diversity of talent is a matter of fairness and a driver of innovation, productivity and growth. That is why encouraging a diverse profession sits at the heart of the Legal Services Board's statutory responsibilities and strategic ambitions.

Although we have seen some progress in dismantling barriers to a diverse profession, this has been slow and uneven. While there have been improvements in entry-level diversity, persistent disparities remain in progression, retention, and wellbeing. These disparities are more than statistics: they represent lost potential, missed opportunities, and barriers to justice. The profession cannot fully serve the public, nor realise its true growth potential, if it does not draw on the full breadth of talent available to it.

This consultation marks an important milestone in our work to address these challenges. Our draft statement of policy sets out clear expectations for regulators, grounded in evidence and designed to support meaningful, measurable change. It builds on extensive research and engagement, including insights from lived experience, data analysis, and dialogue with professionals and other groups across the sector.

We have listened carefully to understand what is working, what is not, and what needs to change. We know that regulation alone cannot solve every issue. But it can set the tone, create the conditions for progress, and support accountability in the sector. This work is part of a wider, concerted effort across the sector to harness the diversity of the profession – for consumers, for the legal services market, and for society as a whole.

We look forward to hearing your views and working together to shape a profession that is inclusive, resilient, and fit for the future.

A handwritten signature in brown ink that reads "Catherine Brown" followed by a horizontal line.

**Catherine Brown**

Interim Chair

A handwritten signature in black ink that reads "Richard Orpin".

**Richard Orpin**

Interim Chief Executive

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## Executive summary

### What are we consulting about and why?

1. Legal services should be accessible to all, regardless of background, and the profession should reflect the society it serves, from entry to senior level. Under [section 3 of the Legal Services Act 2007](#) (the Act), we have a statutory duty to promote a series of [regulatory objectives](#), which include ‘encouraging an independent, strong, diverse and effective legal profession.’ We share this and the wider regulatory objectives with the organisations that we oversee.
2. Our current statutory guidance for legal services regulators on encouraging a diverse workforce ([Annex C](#)) was published in 2017. In 2020, we set out a [clarification on what good regulatory performance looks like on equality and diversity matters](#) within the 2017 framework. Our [10-year sector-wide strategy to reshape legal services](#) bolstered our efforts to encourage a diverse profession with a commitment to dismantle barriers at all levels as part of our overarching goal to support fairer outcomes in the sector.
3. Despite some improvements, significant barriers continue to affect entry, progression, and retention within the profession. These include financial and structural obstacles to accessing legal careers, biased recruitment and promotion practices, unequal work allocation, and pay disparities. Additional challenges such as caring responsibilities, misconduct, non-inclusive cultures, and inadequate support for disabled and neurodivergent professionals exacerbate inequality. A [recent report from the Bar Council on accessibility for mobility impaired people in chambers](#) suggests limited accessibility support overall and an urgent need for chambers to make improvements. Emerging risks from technology, particularly AI, and a culture of long working hours pose further risks to inclusion and wellbeing. A [recent report from the Institute of Government](#) suggests a serious sustainability problem in criminal law and legal aid practice linked to a substantially ageing workforce and attrition in the critical early to mid-career stages.
4. Regulators’ approaches have also shown limitations. Reviews indicate inconsistent strategic oversight, weak evaluation practices, and limited use of diversity data to inform regulatory actions. Addressing these gaps requires a more effective oversight framework that sets clearer expectations and encourages collaborative and evidence-based interventions.
5. A diverse and inclusive legal profession is 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 better enable the sector to dismantle barriers, harness the benefits of diversity, and ensure a sustainable, effective profession aligned with societal needs.
6. We are, therefore, consulting on a proposed statement of policy ([Annex A](#)), which provides a revised regulatory approach to encouraging a diverse profession. Our

proposals aim to remove barriers, promote equality, and foster inclusive professional environments in order to encourage a strong, diverse and effective profession.

## What are we proposing?

7. We are proposing to issue a statement of policy under [section 49 of the Act](#) to encourage a diverse legal profession. Our draft statement of policy sets out four key outcomes which regulators must pursue, supported by core expectations (which all regulators are expected to meet) and enhanced expectations, recommended for greater impact (which regulators should also consider meeting).
8. The extent to which regulators should 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.
9. The table below summarises the outcomes and supporting expectations as set out in the draft statement of policy.

Outcomes	Summary of expectations
Outcome 1: Strategic, evidence-based and collaborative action	<p><b>Core expectations:</b> regulators must implement high-quality diversity data monitoring, identify barriers through research and engagement, and publish strategic action plans with measurable goals. Collaboration with others in the sector is essential to harmonise data and share best practices.</p> <p><b>Enhanced expectations:</b> regulators should also consider taking further steps to support a strategic, evidence-based and collaborative approach, including through horizon scanning, increased accountability, and involving stakeholders in shaping regulatory activities.</p>
Outcome 2: Fair regulatory approaches and decision-making	<p><b>Core expectations:</b> regulators must ensure equality considerations in all regulatory policies, provide equality impact assessments during consultations, and support fair disciplinary processes through training, data analysis, and remedial plans. They should also safeguard wellbeing for those involved in enforcement.</p> <p>We have deemed all expectations developed under this outcome to be core. This is because the core expectations are all fundamental to the pursuit of fair regulatory approaches and decision-making. 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.</p>
Outcome 3: Accessible, flexible and inclusive	<p><b>Core expectations:</b> regulators must ensure qualification routes and training standards promote diversity while maintaining professional standards. They should publish clear information on costs and outcomes to aid informed choices.</p>

pathways into and through the profession	<b>Enhanced expectations:</b> regulators should also consider publishing disaggregated outcomes data, gathering data on education backgrounds, and encouraging firms to offer inclusive training and work experience opportunities.
Outcome 4: Professional conduct and competence	<p><b>Core expectations:</b> regulators must embed duties in codes of conduct to prevent discrimination and promote respect, supported by guidance and competence frameworks requiring ongoing development in equality and inclusion. Regulators must also introduce additional conduct and competence standards for managers to foster healthy and inclusive workplace cultures.</p> <p><b>Enhanced expectations:</b> regulators should also consider encouraging and supporting firms to adopt inclusive leadership practices and strategic plans for diversity.</p>

## How do I respond to this consultation?

10. This consultation is open for responses from **27 November 2025 to 2 March 2026 at 14.00**. You do not need to wait until the deadline to respond and can provide responses online using our [online survey](#). For reference, [Annex D](#) provides a full list of questions included in this consultation.
11. If you would like to access the consultation document in an alternative format (e.g., larger print and/or audio), please contact us at [consultations@legalservicesboard.org.uk](mailto:consultations@legalservicesboard.org.uk).
12. Responses can also be emailed to [consultations@legalservicesboard.org.uk](mailto:consultations@legalservicesboard.org.uk). If you would like to provide your response in a different way (other than through the online survey or a written response), or if you need advice on how to respond to the consultation, please contact us using the contact details above. We welcome your thoughts on any of the questions in the consultation; this might mean only responding to those questions which best suit the contribution you want to make.
13. It is our normal practice to make all responses to consultations publicly available and attributable. We will process your personal data in accordance with all applicable data protection laws, as explained in [our privacy policy](#). If you would rather not be named as a respondent to this consultation, please state this clearly in your response. We may be asked to disclose information provided in response to this consultation, including confidential information under the Freedom of Information Act 2000.
14. Feedback or queries about the LSB's consultation process can be directed to our Consultation Co-ordinator at the email provided above.

## What will happen next?

15. The consultation will be open for just under 14 weeks—an extension from the usual 12-week period to account for the holiday period in December and early January. This additional time reflects our commitment to providing flexibility for respondents and

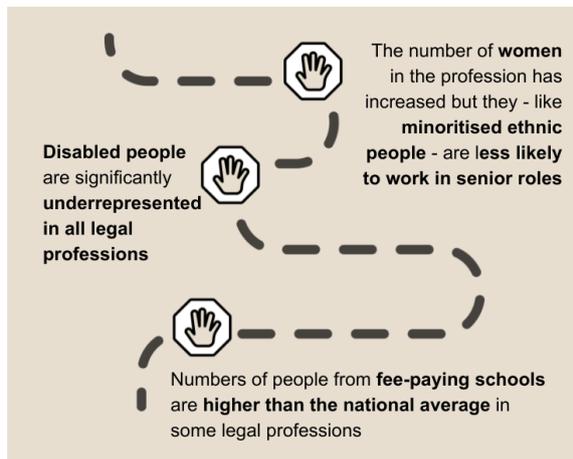
ensuring inclusive engagement. We aim to give everyone sufficient opportunity to participate and share their views. During the consultation period, we will be seeking to engage with stakeholders on the proposals set out in this consultation. For example, through individual engagement with regulators and other stakeholders, webinars, relevant diversity and inclusion events in the sector, and through wider regulation and public body forums and networks.

- Once the consultation has closed, we will analyse responses and finalise our proposals to encourage a diverse profession through regulation. We will then produce a document that summarises responses to our consultation, which will be published alongside a finalised statement of policy for implementation.

## DIVERSITY AND INCLUSION IN THE LEGAL SERVICES SECTOR



### Where is diversity lacking?



### What are the barriers?

Solicitors face a **gender pay gap** of 25.4% and an **ethnicity pay gap** of 25%. Junior women at the Bar earn 77% of what junior men earn.

Disabled people, women, neurodivergent groups and younger people report lower levels of **mental health and wellbeing**. 10% of firms' annual salary bills are lost to poor mental health.

Nearly one in three legal professionals may leave the profession within five years. 32% **wouldn't recommend law as a career**.

### What are we proposing?

Four outcomes for regulators about **taking strategic action**, making sure that regulatory processes are **fair**, making routes into and through the profession more **accessible and flexible**, and setting **clear standards** for their regulated communities.



Basic requirements for all regulators to meet, plus **suggestions for going further**, all of which can be adapted to the unique challenges of each legal profession.

A phased implementation timeline, recognising that **system changes take time**.



### Why does this matter?

A diverse profession helps to...

- build public trust**
- improve outcomes for consumers**
- support innovation and growth**

We and the frontline regulators have a **legal duty** to

**encourage a diverse legal profession**



## The case for change

17. Our case for change and the proposals in this consultation draw on extensive evidence, including quantitative and qualitative research from the LSB and other sector bodies such as regulators, representative groups, and civil society organisations. A detailed rationale is provided in [Annex B](#). We also reference in this consultation document effective practices from outside the legal sector to support our aim of fostering a diverse profession, with examples included throughout. Central to this work are the experiences of those most affected by identified barriers, reflected in the personal testimonies drawn from our research and other publications and included throughout this document.
18. Our case for replacing our current guidance with a statutory statement of policy includes:
- the evidence of persistent diversity gaps and barriers to encouraging diversity within the profession;
  - an opportunity to improve the effectiveness of regulatory approaches to meeting the regulatory objectives, particularly on encouraging an independent, strong, diverse and effective legal profession; and
  - the potential to more effectively harness the strengths of a diverse profession for the benefit of consumers and the economy.



*‘There is a wider accessibility problem within the profession that needs to be addressed. There is still a sense that some of us are “trespassing” on tradition, but the truth is the law serves everyone. The spaces that serve the law must evolve to reflect the notion that everyone is equal before the law.’*

[Source](#)

### Ongoing diversity gaps and persistent barriers to encouraging diversity

19. Diversity statistics across the profession are mixed. Progress has been made in entry-level representation for some groups, but senior-level attainment remains slow. This is particularly the case for women and minoritised ethnic groups. Even where men are underrepresented in some areas (e.g., chartered legal executives and conveyancers), they are more likely to reach senior levels. Senior and more experienced roles for solicitors and barristers are disproportionately occupied by White men, amplifying sex and ethnicity disadvantages for certain groups across these professions. Disabled legal professionals are underrepresented compared with national figures, with substantial underreporting. In terms of socio-economic diversity, some legal roles are heavily skewed toward fee-paying school backgrounds.



*'In order to promote justice we need to have a diverse profession or it won't work.'*

Source

20. Clear and wide-ranging evidence – including research, data, and powerful examples of lived experience – indicates persistent barriers to encouraging diversity within the profession. Insights come from multiple sources including diversity data, literature reviews, systems mapping, statistical studies tracking diversity at all career stages and, first-hand accounts from those working in the profession.
21. The evidence tells us that there are structural, cultural, and personal factors that create and sustain barriers to entering, progressing and thriving in the profession. These include but are not limited to:
  - **Blocked routes into the profession:** high costs, competitive unpaid or connection-driven work experience, and cultural assumptions about the 'typical' legal professional deter people from low-income and 'non-traditional' backgrounds;
  - **Biased recruitment and progression practices:** early hiring and promotion processes disadvantage candidates from lower socio-economic and minoritised ethnic backgrounds due to biased decision-making, flawed processes, and third-party recruiter influence;
  - **Unequal work allocation and pay:** uneven distribution of high-value work drives pay and progression gaps, with women and minoritised ethnic legal professionals earning substantially less and holding fewer senior roles;
  - **Carers face barriers and stigma:** unpredictable caring demands clash with rigid schedules and billable targets. Flexible or part-time work is stigmatised, support is limited, and carers often use annual leave for care needs;
  - **Misconduct and non-inclusive practices:** widespread non-inclusive behaviours, biased assumptions, and a culture that tolerates bullying and harassment block inclusion and deter entry, return to work, and advancement;
  - **Barriers for disabled and neurodivergent professionals:** structural, cultural, and procedural shortcomings limit access, participation, progression, and retention for disabled and neurodivergent legal professionals; with many reporting ill treatment because of their disability and/or neurodivergence;
  - **Technology risks amplifying bias:** AI and other tools can reproduce or increase existing inequalities when trained on biased data or built by teams with unconscious biases; adoption gaps also exist across sexes; and
  - **Poor mental health and unsustainable work culture:** long hours, billable pressures, and client demands drive widespread poor wellbeing, especially for women, younger and junior legal professionals, carers, disabled, and neurodivergent people, harming retention and firm performance.



*'We celebrate having over 100 years of women being able to be lawyers, but they still aren't treated equally, let alone ethnic minorities, people with disabilities, there is so much that needs to be done especially at the senior end of the profession, those prejudices are still there.'*

Source

### **Improving the effectiveness of regulatory approaches to encouraging a diverse profession**

22. Regulators increasingly recognise the role they have to play in effecting change, and have taken steps such as monitoring data, undertaking research, issuing guidance, and embedding relevant standards into professional duties to meet the regulatory objectives. These actions are welcome, but our review shows that their actions are often in isolation, not robustly evaluated and too slow to bring about the improvements needed to encourage diversity in the profession.
23. There is now an opportunity to move from isolated efforts to more strategic, consistent, and evidence-based approaches. In addition, by strengthening evaluation and addressing unintended harms within regulatory processes, regulators can more effectively use the tools available to them to remove barriers and support lasting progress. Our proposals aim to build on these efforts by encouraging effective actions by all regulators, including through collaboration with others.
24. As a matter of good regulatory practice, we have considered whether our objectives could be met through updating our existing statutory guidance. Following thorough assessment of the evidence, we have determined that it is necessary to replace (rather than to simply update) the existing guidance with a refreshed approach. This will provide the necessary clarity and direction required to improve the effectiveness of regulatory approaches to meeting the regulatory objectives, in particular in encouraging an independent, strong, diverse and effective profession.

### **Harnessing the strengths of a diverse profession – for consumers and the economy**

25. A diverse and inclusive profession is beneficial both to the profession itself and also to the public. Encouraging diversity in the legal profession is not only a matter of fairness—it is a strategic imperative for improved consumer experience and economic growth. Our proposals are particularly relevant to the regulatory objective in the Act to encourage an independent, strong, diverse and effective legal profession, but they are also equally relevant to other regulatory objectives, including: protecting and promoting the public interest, improving access to justice, protecting and promoting the interests of consumers, promoting competition in the provision of services, and promoting and maintaining the adherence to the professional principles.
26. The legal sector serves a broad and diverse population, yet many groups, including minoritised ethnic communities, disabled individuals, and those with lower incomes or

education, consistently face deeper disadvantages when accessing legal services. Attracting and retaining a diversity of talent and fostering inclusive and healthy work cultures in legal services, are critical strategies in the vital effort to understand and respond more effectively to the complex and changing needs of a diverse society. A more diverse legal workforce brings a wider range of perspectives, experiences, and cultural competencies, which enhances the profession's ability to understand and meet the needs of all citizens. This, in turn, fosters greater public trust and confidence in legal services. Despite this, [NatWest's most recent legal report](#) suggests that attracting and retaining talent has been identified as the biggest perceived challenge for law firms in the future – the top challenge for at least the last three years.

27. From an economic standpoint, diversity is increasingly linked to innovation, productivity, and [organisational effectiveness](#). There is a growing body of evidence to indicate that diversity [in the workforce](#) (and at [leadership and Board level](#)) can drive better problem-solving, creativity, and competitive advantage. The Government's recently published [Industrial Strategy](#) explicitly identifies diversity as a key enabler for attracting and retaining talent in high-growth sectors like legal services.



*'Belonging is not a luxury. It is a foundation. If we are serious about reshaping legal services to meet society's needs, we must centre inclusion, compassion and lived experience in how we support people across the profession.'*

[Source](#)

28. Regulation that is proportionate, targeted and supports sector growth can play a strong and positive role in driving change. Our proposals are designed to ensure that regulation actively supports a strong, diverse, inclusive and effective legal profession that the public deserves and society needs. We know that regulation is part of the wider picture. Regulators must, therefore, work with the profession and others in the sector to achieve this.

29. For a more detailed discussion on the rationale for our proposals, see [Annex B](#).



*'[W]hen you have a whole profession that is mirroring society then you get that shared understanding of other people's experience.'*

[Source](#)

## Proposed statement of policy

30. Our draft statement of policy proposes a revised regulatory approach to encouraging a diverse legal profession in England and Wales. Our aim is to drive meaningful progress on diversity within the profession, ensuring it better reflects the society it serves. This is grounded in evidence and feedback from stakeholder engagement, and is designed to support regulators in taking effective, measurable action. Our draft statement of policy includes a series of high-level outcomes that are underpinned by more targeted expectations designed to encourage the adoption and implementation of effective measures across legal services regulators.

### Outcomes

31. The proposed outcomes in the draft statement of policy are shaped by the evidence on key barriers and the levers available to regulators. These levers range from their internal practices and approaches to their formal regulatory responsibilities for the conduct and competence of authorised persons (including authorised firms) to education and training routes into and through the profession.

32. We are proposing that regulators **must** pursue the following four outcomes:

**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

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

33. We aim to create a strong but flexible approach 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, we recognise that each regulator operates in a different context. Therefore, unless stated otherwise, we propose that the outcomes in the draft statement should be pursued by each regulator in a way that reflects the specific risks, contexts and characteristics of their regulated communities.

34. The reference in Outcome 4 to 'authorised person' is as per [section 18 \(1\) of the Act](#), where '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 draft statement qualifies any expectation related to authorised firms in a way that ensures relevant expectations are applied only where applicable.

35. [Section 21 of the Act](#) also says that several types of regulatory arrangements may extend to 'regulated persons', which includes both authorised persons and those who are not authorised but are employees of a person who is (and this includes managers of authorised firms). The LSB would expect regulators to take account of such individuals when pursuing the four outcomes.
36. 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 and any other principle that represents best regulatory practice. The LSB has had regard to these principles in developing the proposals set out in this document.

## Expectations

37. We have developed two sets of expectations, described as 'core' and 'enhanced'. These expectations have been designed to enable a proportionate response from regulators, while also supporting the wider better regulation principles (transparent, accountable, consistent and targeted).
38. Firstly, all regulators are expected to pursue the outcomes by meeting the *core expectations*. These represent fundamental requirements to ensure consistent, credible, and meaningful regulatory action to encourage diversity across the profession. Regulators do, however, have discretion to take alternative steps to pursue the outcomes, where they have clear evidence and reasons, for why their proposed alternatives are more appropriate, within their specific regulatory context.
39. Secondly, the draft 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.
40. The enhanced expectations recognise that barriers to diversity in the profession are long-standing and will require regulators to collaborate with partners and stakeholders both within and outside of the legal sector. 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.
41. 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.

42. The extent to which individual regulators should consider implementing 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, a need for greater intervention to tackle more complex barriers, and/or where regulators have determined more targeted 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.
43. The four outcomes collectively constitute a fundamental blueprint to creating and sustaining the conditions necessary for a diverse profession that delivers effectively for consumers and in the public interest. The proposed approach seeks to ensure that all regulators take clear and effective steps towards encouraging a diverse profession and that those regulators that are already taking steps to pursue the proposed outcomes are acting as effectively as possible.

**Q1a.** Do you agree that these proposed outcomes will help to address the barriers to encouraging a diverse legal profession? Are there any further, or alternative, outcomes we should consider?

**Q1b.** Do you agree that the proposed outcomes should be pursued by regulators through a set of specific expectations?

**Q1c.** Do you agree that the proposed structure of core and enhanced expectations under the general outcomes offers an effective way to set a clear minimum standard for all regulators, while also encouraging regulators to consider additional steps, where appropriate?

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

### The problem

44. A strategic, evidence-based approach is essential for driving meaningful, measurable, and lasting progress on diversity in the profession. Ad-hoc, superficial, or poorly informed interventions do not address the root causes of underrepresentation. Instead, [they risk wasting resources, disengaging stakeholders, and even causing harm](#). Clear goals, underpinned by rigorous data, enable regulators to design interventions that target the real barriers to diversity, rather than symptoms or assumptions.
45. Studies from the research (both [national](#) and [international](#)) and [health and social care](#) sectors have identified a number of universal success factors for effective interventions designed to advance equality, encourage diversity and foster inclusive environments. These factors include:
- robust evidence
  - collaboration within and between organisations
  - support of senior leadership
  - strategic alignment
  - adequate resourcing
  - community buy-in
  - strong communication
  - good governance and clear accountability
  - integration into core business priorities.
46. Our current statutory guidance already expects regulators to use robust data, intelligence, and collaboration to design, implement, and evaluate actions that encourage a diverse profession. However, our review suggests that compliance with this guidance is inconsistent and requires improvement.



*'Within the regulators it is clear that there is commitment, though this often feels like travelling uphill, and against the wider focus of the sector [...] The challenge for regulators is in identifying which specific progressive approaches will have the greatest positive outcome; the absence of significant evaluation [...] hinders all regulators in determining how to direct finite (and often limited) resources into the most effective interventions.'*

[Source](#)

47. Data monitoring practices vary widely across regulators. The BSB collects diversity data annually, the SRA every two years, and others less frequently. [Recent analysis](#) suggests that inconsistent data collection practices across legal services regulators creates barriers to benchmarking and progress. Low response rates for some characteristics and

challenges in building a coherent diversity profile highlight the need for more effective, data collection that supports trust and confidence and helps regulators to understand how different aspects of a person’s identity—such as ethnicity, sex, disability, and more—combine and interact to create unique barriers.

48. While quantitative evidence (e.g., statistical diversity data) can support setting aspirational goals for recruitment, retention, progression and pay, [qualitative data enables organisations to make more contextual choices suited to them and their workforce](#). Qualitative research focuses on understanding people’s experiences, behaviours, and social contexts through non-numerical data. Instead of measuring things with numbers, it explores meanings, feelings, and perspectives. This type of research might include, for example, interviews, focus groups, and lived experience testimony from individuals.
49. Although our analysis suggests that some regulators undertake qualitative research to develop a deeper understanding of the diversity gaps in their regulated communities, it is not clear whether all regulators are taking appropriate steps to go beyond quantitative diversity data collection. In [our most recent Regulatory Performance Assessment](#), we identified a need for regulators to develop more effective strategies to encourage a diverse profession that are rooted in both quantitative and qualitative evidence. The absence of qualitative evidence creates real challenges to taking targeted and effective remedial action towards closing diversity gaps in the profession.
50. Although regulators have public commitments to diversity, these are often high-level and not translated into specific, measurable, achievable, relevant, and time-bound (SMART) objectives. Reviews of regulatory approaches have shown that although some collaboration exists, primarily through a voluntary forum that has representation from across regulators, there is significant scope for more effective partnership, including between legal services regulators and other relevant stakeholders.

## Proposals

**Summary table of expectations** (see [Annex A](#) for a detailed description of expectations)

Theme	Core expectations (regulators must)	Enhanced expectations (regulators should also consider)
Data & evidence	<ul style="list-style-type: none"> <li>Have effective, high-quality data monitoring processes in place (including publication of data) 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.</li> <li>Take further appropriate steps to identifying barriers to an</li> </ul>	<ul style="list-style-type: none"> <li>Horizon scanning for emerging barriers and opportunities (e.g., technology, demographic shifts, evolving consumer needs).</li> </ul>

	equal, diverse, healthy and inclusive profession.	
Strategic planning	<ul style="list-style-type: none"> <li>Develop and publish evidence-based strategic action plans with SMART objectives, risk management, and evaluation.</li> <li>Ensure accountability at governing body level and report progress transparently.</li> </ul>	<ul style="list-style-type: none"> <li>Building on the strategic action plan to drive greater results, by including additional elements such as outcomes-based targets for activities, further accountability measures and enhanced evaluation practices.</li> </ul>
Collaboration	<ul style="list-style-type: none"> <li>Work collaboratively with other regulators and stakeholders to share learning, harmonise data monitoring, and promote sector-wide consistency.</li> </ul>	<ul style="list-style-type: none"> <li>Designing and evaluating interventions with regulated communities; foster a culture of continuous improvement.</li> </ul>

51. We consider that regulators should have a clear and thorough understanding of the diversity of their regulatory communities, and where greater diversity is needed. Our analysis of the evidence has identified an opportunity to increase clarity on what we expect of regulators on how they collect and analyse diversity data.

52. We are proposing that regulators must demonstrate that they have effective and high-quality data monitoring processes. The [Government Statistical Service \(GSS\)](#) (drawing on the European Statistical System) defines data quality through dimensions such as relevance, accuracy, reliability, timeliness, accessibility, clarity, coherence, and comparability. We expect 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.

53. We are proposing that, at a minimum, regulators collect data on the protected characteristics in the Equality Act 2010 and on socio-economic background (SEB), with flexibility to go further where appropriate. Guidance from the [Social Mobility Commission](#) and the [Government Analysis Function](#) can support identifying the most effective way of collecting SEB data. Regulators should consider how to encourage accurate, up-to-date data sharing and to understand how different aspects of a person’s identity—such as ethnicity, sex, disability, and more—combine and interact to create unique barriers. Better data helps ensure everyone is treated fairly and that no group is disadvantaged by accident. Data collection should, as always, [respect privacy](#), be proportionate, and comply with all relevant laws.

54. Quantitative data alone cannot explain why diversity gaps persist. Qualitative research provides essential context and helps regulators understand the root causes of underrepresentation and disproportionate attrition. We are, therefore, proposing that regulators must take additional steps beyond collecting quantitative diversity data. Combining quantitative and qualitative evidence should enable regulators to set

meaningful goals, design targeted interventions and, evaluate what works in their specific context. Qualitative research can identify barriers such as in recruitment and promotion; progression and retention challenges; bullying, harassment, and misconduct; mental health and wellbeing; disability inclusion; and pay gaps.

55. We consider that a clear, evidence-based and publicly available strategy should be expected of all regulators to ensure that they are taking effective steps to encouraging a diverse profession and transparently accounting to stakeholders how and when these steps are being achieved. We are, therefore, proposing that regulators produce and implement a strategic action plan that addresses both the challenges and opportunities to encouraging a diverse profession.
56. Each 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. Our draft statement of policy proposes that, at a minimum, regulators' strategic action plans must be overseen by their governing bodies, include clear goals, include clear risk management, be underpinned by evaluation frameworks, and be subject to regular review and reporting.
57. Collaboration is critical for sharing learning, [harmonising data](#), and driving sector-wide improvement, as regulators operate as part of a wider eco-system. As well as legal services regulators, working with partners in the wider system will be critical to addressing barriers and encouraging a diverse profession. Regulators are best placed to identify the most appropriate relationships and approaches, but this might include representative bodies, voluntary sector organisations, professional interest groups, regulators outside the legal sector or working in other jurisdictions, and further and higher education providers.
58. Regulators are encouraged through the proposed enhanced expectations to take additional steps beyond those in the core expectations, by, for example, horizon scanning for emerging and future barriers (such as technological change, evolving consumer needs, and demographic shifts), working closely with regulated communities to design and evaluate interventions, and fostering a culture of continuous improvement and leadership in the sector.

**Q2a.** Do you agree with the proposed Outcome 1?

**Q2b.** Do you agree that the proposed expectations will help regulators to pursue Outcome 1? Are there any further expectations beyond those we have included that would support regulators to pursue this outcome?

**Q2c.** Are there any enhanced expectations that would be better placed under core expectations under Outcome 1? Are there any core expectations that would be better placed under enhanced expectations under Outcome 1?

**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

### The problem

59. Fairness and equality in regulatory processes are fundamental to legitimacy, compliance, and public trust. Evidence from the legal sector and beyond shows that, without deliberate design and scrutiny, regulatory systems can inadvertently perpetuate disadvantage and bias.



*‘As part of their ongoing evaluation, regulators must explore the impacts of their interventions and decisions on service users, with a particular focus on differential impacts and outcomes, seeking to understand their underlying causes [...] Regulators should seek to understand differential impacts and outcomes of their processes for different groups and work to eliminate these where it is within their powers to do so.’*

Source

60. As public authorities or organisations delivering a public function in England and Wales, some regulators have both general and specific duties under the [Public Sector Equality Duty \(PSED\)](#) in both employment practices and service provision. Equality impact assessments provide an important process that demonstrates regulators’ compliance with the PSED. Our [most recent Regulatory Performance Assessment](#) identified that several regulators were not conducting equality impact assessments (EIAs) at the earliest possible stages of policy development. This means that potential adverse impacts on protected and other diversity characteristics are not always identified or mitigated, leading to missed opportunities for prevention and improvement.
61. Research by the SRA and BSB has consistently shown that certain groups are overrepresented in disciplinary and enforcement processes. For example, the SRA’s [recent research on overrepresentation of groups in its disciplinary and enforcement processes](#) found that legal professionals from minoritised ethnic backgrounds were more likely to be subject to regulatory action than White individuals, even after controlling for other factors. The [BSB’s most recent Regulatory Action Diversity Report](#) showed that reports regarding male barristers were around 1.3 times more likely to be referred to the BSB Enforcement or Supervision teams compared to those regarding female barristers, and reports regarding minoritised ethnic background barristers were around 2.3 times more likely to be referred compared to those regarding White barristers. This raises concerns about unfair treatment and the need for robust, ongoing analysis.
62. Most recently, [Baroness Harriet Harman KC’s report into bullying and harassment at the Bar](#) highlighted that limited support for both complainants and respondents in disciplinary processes can undermine trust, wellbeing, and perceptions of justice among

professionals. The absence of trauma-informed approaches and accessible reporting mechanisms may be creating even more barriers for professionals already in distress.

63. Failure to address fairness and equality in regulatory processes can perpetuate barriers, undermine efforts to encourage diversity, and lead to disengagement from those the system is meant to protect. It can also result in legal challenges, reputational damage, and loss of stakeholder trust.

64. Regulators in the health and social care sector have demonstrated that transparent criteria, documented reasoning, and regular review of outcomes in disciplinary and enforcement processes foster trust and reduce appeals. The General Medical Council's (GMC) [fairness in regulation review](#), for example, led to significant changes in how regulatory processes are designed and monitored, with a focus on equality impact and transparency. The GMC's efforts have been recognised by its oversight regulator, the Professional Standards Authority (PSA), [as an example of good practice on this matter](#).

## Proposals

**Summary table of expectations** (see [Annex A](#) for a detailed description of expectations)

Theme	Core expectations (regulators must)	Enhanced expectations (regulators should also consider)
Assessing equality impact	<ul style="list-style-type: none"> <li>Identify and address impacts on protected and other diversity characteristics (including socio-economic background) arising from new or updated regulatory policies or actions.</li> <li>Provide equality impact assessments when formally consulting</li> </ul>	<ul style="list-style-type: none"> <li>We will use consultation feedback to develop enhanced expectations that may be appropriate.</li> </ul>
Disciplinary and enforcement processes	<ul style="list-style-type: none"> <li>Take steps to ensure fairness in disciplinary and enforcement processes, including appropriate training, data analysis, remedial plans, and support for wellbeing of all parties.</li> </ul>	

65. Regulators must ensure that their approaches, decision-making, and enforcement do not inadvertently perpetuate bias or undermine diversity efforts. This requires robust equality impact assessment, anti-bias controls, and continuous monitoring.

66. We propose that to pursue this outcome regulators 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. The Equality and Human Rights Commission provides practical guidance on effectively considering equality in policy making for public authorities and organisations delivering public functions in [England](#) and [Wales](#).

67. We also propose that regulators, when formally consulting, provide an equality impact assessment to stakeholders to support informed feedback, to demonstrate how equality considerations have been considered, and, where necessary, to seek further evidence and insights from stakeholders to inform policy development.

68. To tackle the concerning trend of overrepresentation of certain groups in regulators' disciplinary and enforcement processes, we also propose several steps for regulators to take to support fair outcomes in this area. This should include delivering appropriate mandatory and voluntary training that supports best practice and decision making in disciplinary and enforcement procedures, such as vulnerable witness training and trauma-informed practice training for panel members, staff and any other relevant party involved in the decision-making process.

69. 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.

**Q3a.** Do you agree with the proposed Outcome 2?

**Q3b.** Do you agree that the proposed expectations will help regulators to pursue Outcome 2? Are there any further expectations beyond those we have included that would support regulators to pursue this outcome?

**Q3c.** Are there any enhanced expectations we could set for regulators to pursue Outcome 2?

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

### The problem

70. Access to the legal profession is shaped by a complex web of structural, financial, and cultural barriers. These include opaque recruitment processes, high and unpredictable training costs, lack of accessible information, and inflexible training and qualification routes, all of which disproportionately affect underrepresented groups.



*'A lot of the time I think there's a knowledge gap, people just don't know what to expect. And [...] you can't expect someone who has never been in the legal industry, doesn't know how to compete, with someone who has a father that has worked in the City in law firms all their life, knows the entire process from back to front [...] I think it's massively unfair.'*

Source

71. Without fair and accessible pathways, the profession risks losing talented individuals, perpetuating existing inequalities, and failing to reflect the society it serves. This not only limits the pool of talent but also undermines public confidence in the profession's ability to serve all communities.

72. We know from our review of the evidence that there are profound barriers to getting into and progressing within the profession for many. Candidates from lower socio-economic backgrounds, minoritised ethnic groups, disabled people, and those with caring responsibilities face additional hurdles in accessing and progressing within the profession. These include lack of networks, financial insecurity, and inflexible work or training arrangements.



*'There is no flexibility for working while studying. To attend work experience, interviews or network I had to take unpaid annual leave. And there is only so much of that I could do to survive. Having lots of unpaid internships and experience in other "extra" things like debates and charity networks has become the "norm" but if you are not having to work to support yourself it's an unfair advantage to have these.'*

Source

73. Although some regulators are taking steps to increase equality of access to (and through) the profession, this is not consistent, and improvements could be made to how all regulators take appropriate steps to effectively advance equality of access and opportunity for all and to encourage a diverse profession. The SRA's introduction of the Solicitors Qualifying Examination (SQE), for example, was intended to widen access, but sector feedback and early data indicate that, while the new system has opened the

market to a wider pool of training providers and increased the number of ways candidates can obtain qualification experience, costs, lack of transparency about outcomes, and limited support for non-traditional candidates remain significant obstacles. The [Law Society's Diversity Access Scheme](#) has helped some individuals, but demand far outstrips supply.



*'Applying to the Bar and the nature of the pupillage application process is daunting, challenging and exhausting. When disability is also taken into consideration during the pupillage application process, these difficulties are exacerbated in both the application and of the physical and mental challenges of pupillage and the barriers that can be put in the way of achieving this career for those with disabilities.'*

Source

74. A recent [white paper from Government](#) details a growing skills shortage in England and sets out a reform programme for the country's post-16 education and skills system to drive economic growth, close the skills gap and improve opportunities for all learners. The reform programme aims to harness the potential of flexible, affordable and accessible routes into employment for both young people and those already in the workforce. The white paper also commits to enhancing support for learners with mental health needs and special educational needs and disabilities (SEND), as well as simplifying careers advice and guidance. Regulators should consider how routes into the legal profession are designed in a way that meets the challenges identified in this white paper and does not leave any learner or aspiring legal professional behind, regardless of background.



*'It took me about six months to get a job after I'd finished my Law degree and I think that was down to my disability as well; I went for interviews and they'd say I hadn't got any experience, which was true, but I also got the impression that there were also other people with no experience, and when they started asking, "How many sick days will you have?" [...] I just knew I wasn't going to get it.'*

Source

## Proposals

**Summary table of expectations** (see [Annex A](#) for a detailed description of expectations)

Theme	Core expectations (regulators must)	Enhanced expectations (regulators should also consider)
Pathways and access	<ul style="list-style-type: none"> <li>Ensure that training routes to qualification, approved by the regulator, are designed to support equality of access and encourage diversity, while maintaining professional standards.</li> </ul>	<ul style="list-style-type: none"> <li>Where appropriate, publishing outcomes for legal training disaggregated by diversity characteristics.</li> <li>Collecting and publishing data on education and training</li> </ul>

	<ul style="list-style-type: none"> <li>• As applicable, set and monitor standards for authorised training, qualification and/or assessment providers that support diversity goals.</li> <li>• Make relevant information publicly available to support candidates' informed decisions, including costs and outcomes.</li> </ul>	<p>background of authorised persons.</p> <ul style="list-style-type: none"> <li>• Where applicable, encouraging firms to develop work placement and training programmes that foster diversity and inclusion.</li> </ul>
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75. Regulators play a vital role in authorising and monitoring qualification and assessment routes, setting standards for training and assessment providers, and ensuring that relevant information is available to all. The regulation of education, training and assessment pathways should be done in a way that advances equality, encourages diversity, and supports inclusive and healthy learning environments for all. Regulators outside the legal sector have committed to [setting standards that make sure professional education and training is fair and is based on principles of equality and diversity](#), including taking steps to tackle evidenced differential attainment. Recent figures from the SRA suggest that alternative routes to authorisation in the solicitors profession are not only widening pathways for underrepresented groups, but that [candidates following these routes are outperforming those who follow more traditional tracks in assessment](#).

76. The potential for legal services regulators to open up new pathways and create flexibility within existing pathways has been demonstrated by: the BSB's approval of an apprenticeship route; IPReg's focus on increasing good quality providers of qualification pathways and examinations, in particular [as a tool to increase the diversity of the trademark and patent attorney professions](#); and CRL's changes to requirements around academic training for authorisation. CLSB has recently undertaken [research to better understand the career pathways](#) for its regulated community, in an effort to strengthen the current profession and support the next generation of costs lawyers. Following a recent investigation into the [potential causes of differential outcomes by ethnicity in legal professional assessments](#), the SRA has committed to an action plan to foster equality of access and opportunity in the profession. As part of this work, it has created a collaborative forum, in which stakeholders from across the sector are invited to share best practice and discuss solutions to reducing differential outcomes in legal education and training.

77. We welcome these examples of interventions undertaken by some regulators but consider that all regulators should be expected to use their powers to make more accessible and flexible routes into and through the professions. Increasing flexibility in routes available to aspiring legal professionals need not undermine the standards required to undertake authorised practice. Initiatives to encourage diversity are about ensuring fair access and maximising the available talent pool, not about lowering standards.

78. Where ‘authorised provider’ is used in our draft 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 profession on the regulator’s behalf.
79. Setting and monitoring standards for authorised providers ensures that steps to encourage diversity and support inclusive environments are embedded throughout the qualification process, supporting fair access and progression. It is for regulators to design appropriate standards for authorised providers. These could include standards on:
- creating and safeguarding inclusive training environments;
  - taking effective action to making reasonable adjustments for individuals;
  - supporting trainees to develop appropriate competencies relevant to equality, diversity, wellbeing and inclusive environments in the profession; and/or
  - ensuring fairness in assessment methodologies.
80. Publicly available information on routes, costs and outcomes empowers candidates to make informed decisions, and it reduces informational barriers. Transparent data on progression and outcomes – disaggregated by diversity characteristic – enables regulators and providers to identify and address disparities. Sector-wide initiatives, such as the [Social Welfare Solicitors Qualifying Fund](#), the [Advice Workforce Development Fund](#) and [contextual admissions in higher education](#) show that targeted informational (and financial) support can have a transformative effect on access and retention.
81. We include in the enhanced expectations under this outcome a proposal that regulators should consider ways of encouraging firms to develop work placement and other relevant training programmes in partnership with education and professional training providers, in a way that encourages diversity and fosters inclusive and healthy learning and work environments.
82. We have not yet developed proposals to address the specific barriers which may affect how authorised persons move within the professions and return to practice (e.g., following extended periods of leave due to health reasons, caring responsibilities and other extenuating circumstances). We welcome responses from stakeholders to inform our thinking on whether it would be prudent and helpful to include expectations to address these, in particular, responses that relate to any barriers introduced or exacerbated by current regulatory rules and/or practices.

**Q4a.** Do you agree with the proposed Outcome 3?

**Q4b.** Do you agree that the proposed expectations will help regulators to pursue Outcome 3? Are there any further expectations beyond those we have included that would support regulators to pursue this outcome?

**Q4c.** Are there any enhanced expectations that would be better placed under core expectations under Outcome 3? Are there any core expectations that would be better placed under enhanced expectations under Outcome 3?

**Q4d.** Are there any additional expectations, either core or enhanced, we should set under Outcome 3 to reduce barriers faced by authorised persons when moving between and/or re-entering the professions (e.g., following a prolonged absence from practice for health, caring or other reasons)?

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

## The problem

83. Workplace culture, conduct, and competence are critical for diversity and inclusion in the profession. Individual professionals and firms (including chambers) create the conditions that determine who enters, who stays in, and who advances within the profession, through recruitment and progression practices, as well as workplace culture and behaviours.



*'It isn't uncommon to be the only female the higher up the ladder you go, even in family law. There is definitely a tendency for clerks to put women on family law cases.'*

[Source](#)

84. Our review of the available evidence suggests that current practices in the sector are not conducive to advancing equality of opportunity, encouraging diversity, or fostering inclusive and healthy work environments. As our evidence shows (see [Annex B](#)), there is a concerning trend of harmful behaviours and workplace practices in the sector, including biases in recruitment and progression, unequal work allocation and pay, caring stigma, barriers for disabled individuals, bullying and harassment, and poor wellbeing. Such practices and behaviours diminish the professional culture for all and often have a disproportionate impact on underrepresented groups.

85. Without robust frameworks for conduct, competence, and management, the profession risks perpetuating exclusion, undermining wellbeing, and failing to meet the needs of clients and society. This can lead to increased complaints, reputational damage, and loss of talent, as well as a failure to uphold the public interest and the rule of law. Our consultation earlier this year on [upholding professional ethical duties in legal services](#) highlighted the significant risk that unethical behaviour and practices pose to the profession, the public and to the sustainability of the sector. Our proposals to encourage a diverse profession are aligned with our professional ethics work in seeking to create and sustain an effective profession that delivers in the public interest.

86. Regulators have a unique responsibility to set and monitor clear standards for individuals, managers and authorised firms; to support wellbeing; and to encourage inclusive leadership and continuous improvement in the sector. The right frameworks not only prevent harm but also foster environments where all professionals can thrive, ensuring the profession reflects and serves the society it represents.

87. In 2022, all eight legal services regulators (alongside the Bar Tribunals and Adjudication Service and the [Solicitors Disciplinary Tribunal](#)) signed [a shared principles-based](#)

[statement to tackle counter-inclusive misconduct through disciplinary processes.](#)

Regulators committed to challenging and appropriately sanctioning conduct that intentionally or unintentionally has the effect of narrowing or denying opportunities to people because of their background or characteristics. Regulators agreed to reflect the seriousness of such conduct in regulators' standards and codes of conduct and to support each other to promote sector-wide understanding that unacceptable behaviour must be challenged wherever it is found.

88. Our evaluation of adherence to the statement has shown that, whilst there has been some activity in response, application has been limited and inconsistent. Furthermore, although all regulators have standards in their regulatory frameworks which relate broadly to preventing conduct that poses a risk to equal treatment, diversity and/or inclusive environments, to varying degrees, not all frameworks fully articulate the minimum behaviours that should be expected of those they regulate. For example, the BSB's Code of Conduct has recently been criticised for [not providing sufficient regulatory guardrails against bullying at the Bar](#) and for [a lack of clarity and enforceability](#).



*'While the prevailing view at the Bar is that bullying, harassment and sexual harassment is a problem which must be tackled, there are still those who seek to deny it. This is commonly expressed by acknowledging that while it used to be bad in the past, things have improved to the extent there is no longer a problem.'*

[Source](#)

89. It is vital that regulators have in place and monitor robust rules which govern the conduct of the professions they regulate. Equally important is that these rules are clearly understood and applied by those whose behaviour they govern. Where standards are unclear, abstract and untethered to real-life situations, regulated professionals are likely to struggle to effectively meet the behaviours that are expected of them. Our analysis of regulators' current frameworks suggests that more clarity is required to secure compliance.
90. LawCare's recent [Life in the Law](#) report found that professionals want more training on wellbeing, resilience, and interpersonal skills, and that current frameworks do not always prepare them for the realities of practice. The report highlights that poor workplace culture and lack of support are key drivers of stress, burnout, and attrition, with underrepresented groups facing disproportionately high levels of poor wellbeing. LawCare's research found that a significant proportion of those surveyed said they planned to leave their roles and the profession within the next five years, which raises serious concerns about the sustainability of the sector and its ability to deliver on consumer needs.



*'I have almost left the profession several times. I do know many women who have had similar experiences who have left and I do think we are losing talented people because these practices are not being addressed.'*

[Source](#)

91. We know from our review of the available evidence that competent and effective managers are critical to creating and safeguarding positive workplace cultures and to supporting the development and progression of professionals. An example is a [recent study from The Young Foundation](#) that found poor management is a leading reason for professionals considering leaving their field, especially among already underrepresented groups. The report also found that line manager training and clear standards are perceived by professionals to be among the most effective interventions for improving equality, diversity, inclusive work environments, and wellbeing.



*'In another firm I had challenges about wearing a headscarf. They said I could wear it in the office but asked me to take it off if I met a client, saying it would mean they could relate to me more. It was about representing the firm "correctly."*

[Source](#)

92. Research from the [International Bar Association](#) suggests that although the majority of law firms recognise the importance of line management in supporting workplace mental health and wellbeing, this is not being met with practical support and training. LawCare's [Life in the Law](#) report highlights a clear desire from 70% of managers to receive additional training and support, including on equality, diversity, and inclusion.



*'They said [progression] was determined by how many years qualified. But then it was going to happen in 3 years' time, but they said that every year. It wasn't clear what you need to do to get to the next level, a total mystery. There was no transparency. The information seemed to be conveyed to select people. And even if you did tick all the boxes, it still seemed to depend on who you were managed by.'*

[Source](#)

93. Alongside line management, leadership plays a crucial role in advancing equality, encouraging diversity and fostering inclusive environments in law firms. However, recent research suggests that there is [a gap between leadership's commitment and how empowered leaders feel to support these commitments](#).

94. Supporting wider organisational efforts to advance equality and encourage diverse and inclusive workplace environments is important. Regulators can play a vital role in this. For example, recent [research from the University of Exeter](#) indicates a desire in the sector for greater accountability among law firms, including the SRA holding authorised firms to account for progressing diversity initiatives, policies and outcomes. Some participants in the research suggested that the SRA should have a role in pushing firms to publish data on representation of certain groups within their workforce, as well as plans to address any shortfalls.<sup>1</sup>

## Proposals

**Summary table of expectations** (see [Annex A](#) for a detailed description of expectations)

Theme	Core expectations (regulators must)	Enhanced expectations (regulators should also consider)
Conduct & competence	<ul style="list-style-type: none"> <li>• Have and monitor clear standards in 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.</li> <li>• Provide practical guidance and resources to support compliance.</li> <li>• Have and monitor competence frameworks that include mandatory training on professional standards, including fair treatment and respect for all colleagues, at entry and throughout careers.</li> <li>• Have and monitor additional standards and competence requirements for managers to ensure fair, compassionate, and inclusive management.</li> <li>• Support authorised persons and regulated persons in firms to identify and use appropriate channels to raise concerns about conduct.</li> <li>• Where applicable, require authorised firms to understand</li> </ul>	<ul style="list-style-type: none"> <li>• Where applicable, encouraging and supporting authorised firms to promote diversity in leadership and inclusive leadership practices.</li> <li>• Where applicable, encouraging and supporting authorised firms to develop and implement evidence-informed strategic plans for fair, diverse, healthy, and inclusive environments.</li> </ul>

<sup>1</sup> Respondents felt this could be done on a ‘comply or explain’ basis (similar to the Financial Reporting Council regulations for public listed companies) and that this transparency could allow clients and potential employees to choose not to engage with firms who were underperforming.

	<p>and address diversity gaps and wellbeing and inclusion challenges, and to report on these to the regulator.</p> <ul style="list-style-type: none"> <li>• Where applicable, encourage and support authorised firms to design, implement, and monitor workplace policies that advance equality, encourage diversity, and foster inclusive and healthy work environments.</li> </ul>	
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### Supporting professional conduct and competence

95. Regulators have considerable influence over how legal professionals behave and in helping shape shared professional values. They oversee the way legal services professionals are trained and educated and set standards of conduct and expectations of professional behaviour. They also have powers to act where conduct falls below those expectations including through disciplinary processes.

96. We expect regulators to ensure that their regulatory frameworks include, at a minimum, standards for 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. These behaviours are necessary to fostering inclusive work environments and should be expected of every practicing individual.

97. Regulators have a responsibility to ensure that their standards are clear and well communicated, with supporting resources and guidance for those they regulate to aid compliance. The [SRA's guidance on complying with its Principle 6](#) (encouraging equality, diversity and inclusion), for example, offers a list of examples of activity that would be deemed as contrary to the proposed duty to treat others fairly and with dignity and respect, as well as practical solutions to preventing and responding to unacceptable behaviour.

98. Initial and ongoing training in the profession is vital to ensure that authorised persons have and maintain a standard of competence and skill that enables them to administer legal services with confidence. Consumers should be able to trust that legal professionals have the necessary, up-to-date skills, knowledge, attributes and behaviours (i.e. are competent) to provide good quality legal services. It is the responsibility of regulators to assure themselves that those they regulate remain competent throughout their careers and that risks to consumers from harm caused by poor competence, are avoided.

99. [Section 4\(a\) of the Act](#) sets out a mandate for the LSB to assist in the maintenance and development of standards in relation to the education and training of persons authorised to carry on activities which are reserved legal activities. Regulators oversee competence frameworks to shape and support the learning of legal professionals at the point they

enter a career in law as well as throughout their professional lives. These frameworks are usually based on both technical legal skills and behavioural or developmental competencies such as working ethically and well with others.

100. In order to exhibit the appropriate standards to support an inclusive profession that promotes equality for all, nurtures wellbeing, and values diversity, we consider that authorised persons must be equipped with and maintain the right level of knowledge and the appropriate tools to practice effectively. We are aware that some regulators include training on issues related to diversity (and equality and inclusion) in their competence frameworks. We are seeking to ensure that this is applied across all regulators and that this forms a mandatory part of a professional's competence to practice, both at the point of authorisation and throughout their careers.
101. Expectations within competence frameworks could include 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/or
  - to understand, avoid and respond to bias and behaviours in the profession that pose a risk to encouraging a diverse and inclusive profession.
102. There is a growing body of evidence that showcases the effectiveness of reflective practice in supporting professional practice and positive behaviours, as well as improving outcomes for recipients of services. The Bar Council has recently started work to [pilot a number of different reflective practice approaches](#) – to move away from 'crisis management' to taking more proactive and preventative measures to support wellbeing in the barrister profession.
103. Any post-qualification standards should be made in line with the expectations set out in our [ongoing competence statement of policy](#).

### **Providing clear channels to raise concerns**

104. Where concerns and/or complaints about conduct that poses a risk to a fair, healthy and inclusive professional environment arise, it is vital that individuals are aware of appropriate channels through which these can be raised. These concerns are not necessarily issues to report to the regulator, if, for example, these are deemed to be below clear thresholds for misconduct. The [Bar Council's Talk to Spot](#) platform provides a practical model for supporting individuals to raise concerns and access support in alternative ways. This initiative demonstrates the importance of accessible, confidential, and responsive channels for reporting and addressing inappropriate conduct. We are aware that the BSB is working with the Bar Council on [implementing recommendations from the recent review from Baroness Harman KC](#), including on duties to report misconduct.

## Driving competent and compassionate management

105. Where we use the term ‘manager(s)’ in our proposals, this refers to any authorised person with responsibilities for managing both authorised persons and ‘regulated persons,’ which includes those who are not authorised but are employees of a person who is (and this includes managers of authorised firms). [Section 21 of the Act](#) states that several types of regulatory arrangements may extend to regulated persons. We expect regulators to take account of such individuals when pursuing the outcomes in the draft statement of policy, particularly Outcome 4.

106. The additional standard for managers reflects the important role they play in preventing and responding to non-inclusive practices and misconduct, recently emphasised in [Baroness Harman KC’s report on bullying and harassment at the bar](#) and research on supporting the mental health and wellbeing of legal professionals in the [UK](#) and [elsewhere](#). The [SRA’s updated guidance](#) on supporting compliance with its standard on encouraging equality, diversity and inclusion provides a positive example of explicit standards and expectations, including for managers and leaders. The [National Institute for Health and Care Excellence’s \(NICE\) guidance for mental wellbeing at work](#) sets out clear initiatives that organisations could take to improve mental health and wellbeing in their workforces, including training and support mechanisms for managers.

107. Training and standards for managers are critical for creating positive workplace cultures and supporting the development and progression of all professionals. The types of learning managers could pursue include:

- 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/or
- taking practical steps to encourage a healthy and inclusive culture for all.

108. Demonstrating [compassionate management and leadership](#) means taking a relationship-based focus to management through listening, understanding and supporting others to feel valued and respected, and to achieve their potential. There is a growing body of evidence which shows that compassionate leadership has many wide-reaching benefits, including more engaged staff with higher levels of wellbeing and improved outcomes for organisations.

## Encouraging and supporting strategic organisational practice

109. As per section 18 (1) of the Act, ‘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 also expected to be considered in pursuing this outcome.

110. We believe that regulators should have appropriate standards which encourage and support authorised firms to take more evidence-based and effective steps to encouraging diversity in the workforce, while also ensuring accountability – this should apply to all legal services regulators that regulate authorised firms.



*'When I walk into a room, I cannot (and will not) hide who I am. People can see that I am a black woman, but there are many parts to me which are not so visible. As human beings, we are multi-faceted, and therefore we cannot be viewed from a single aspect [...] This is why the focus has to be on increasing diversity in the legal profession, and having inclusive cultures within organisations to prevent attrition.'*

[Source](#)

111. The [Young Foundation](#) suggests some sources of evidence that could provide firms with insight to inform their approaches, for example, that employers should use various forms of data, such as staff surveys and exit interviews, to identify examples of discriminatory and/or non-inclusive activities. Exit interviews should help to identify factors that may be contributing to disproportionate attrition levels for some groups. A recent study on the practices of eight major law firms in the UK, for example, showed that [trainees from low socio-economic backgrounds are overrepresented amongst those who leave a firm](#). This report provides further examples of data law firms are using to drive effective practices in encouraging equality and diversity.

112. Elsewhere, findings from research undertaken by the Law Society to develop its recently launched equality, diversity and inclusion strategy indicated [a desire for practical, actionable resources, as well as best practice and tools for measuring progress](#). The Law Society's strategy emphasises further the importance of supporting firms delivering legal services to build more inclusive workplace cultures.

113. We propose that regulators, where applicable, encourage and support authorised firms to design, implement, and monitor workplace policies that advance equality, encourage diversity, and foster inclusive and healthy work environments. Regulators and their regulated communities are best placed to identify the most relevant policies.



*'Many senior females are told by recruitment agents they should be going for Professional Support Lawyer roles. I was pushed to PSL roles all the time. But I like client facing, I'm good at it and enjoy it [...] recruitment agents wouldn't put me forward for one role as I was asking to go 4 days a week, or 5 days with 1 at home. They said there was no point as it won't get you anywhere. I stood up to them, so they put me forwards and I got an interview.'*

[Source](#)

114. We provide below, by way of example, suggested policies which might be considered by regulators and those they regulate to ensure workplace practices and processes advance equality and encourage diversity:

- recruitment (including working with third-party recruitment agencies to make new appointments or promote existing staff members);
- relevant training and ongoing learning for the workforce (both legal and non-legal professionals), with specific training requirements for those in HR and/or involved in the recruitment of new or promotion of existing staff;
- fair and transparent work allocation and distribution processes;
- responsible, fair and transparent remuneration processes;
- pay gap reporting by sex, ethnicity, socio-economic background, and disability, as well as for any other characteristics not already required by law, for authorised firms with 250 or more employees;<sup>2</sup>
- flexible working (empowering workforce to have more control over working patterns);<sup>3</sup>
- parental, adoption and caring leave;
- meeting legal obligations to provide reasonable adjustments, where these are requested by staff; and/or
- responsible use of technology and innovation, where relevant to the profession (e.g., recruitment, adjustments to support disabled & neurodivergent colleagues, distribution of work tasks).



*‘Social events were harder to participate in, as it is often that people go out after work at 6.30pm and I finish earlier, or they play sport, and I can’t do that.’*

Source

115. Suggested policies to support safe, inclusive and healthy work environments include:

- anti-bullying and anti-harassment (for both online and in-person contexts);
- proactively fostering healthy working practices that support mental health and wellbeing;
- respectful engagements with those that legal professionals work with in the workplace (including non-legal professionals);
- inclusive workplace practices and behaviours (including using and promoting inclusive language in person and through communications, supporting inclusive work-based social engagements and events);

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<sup>2</sup> The suggested benchmark of 250 or more employees aligns with [Government requirements for gender pay gap reporting](#).

<sup>3</sup> The Young Foundation’s [Beyond Buzzwords report](#) (2024) suggests that flexible working arrangements were the most prevalent and most effective interventions to support equality, diversity and inclusion in the workforce (considered by 78% of respondents/organisations that had them in place). Elsewhere, the Australian National University and University of Melbourne’s [recent report on the wellbeing of legal professionals](#) suggests that flexibility in working arrangements, as well as in workload, and use of leave form some of the most beneficial supports at work.

- ensuring that relationships between professionals and the clients they work with are built on values of dignity and respect and safeguard the wellbeing of authorised persons and employees, while performing duty to the client; and/or
- reporting inappropriate behaviour and actions (including safeguarding those who raise concerns about the workplace or other professionals).

116. Depending on the regulatory and organisational context, regulated firms could be further supported by regulators to develop a more strategic approach to their activities to encourage diversity. This is particularly true for organisations with greater resources, capacity and capabilities. For this reason, we propose that regulators could also consider, where applicable, additional steps to encouraging and supporting authorised firms to achieve this. A [recent report from the Bridge Group](#) offers some examples of effective practice that support inclusion in the workplace.<sup>4</sup> In addition to the specific approaches suggested by the Bridge Group, activities in authorised firms could also include:

- interventions to support workplace infrastructure that is inclusive and accessible to disabled individuals and other relevant groups;
- exploring and testing innovative models of performance measurement (e.g., values- and outcomes-based models that promote collaboration and collective working partnerships within and, across teams); and/or
- supporting firms to use [positive action](#), as described in the Equality Act, to meet equality of opportunity and diversity aims.



*'Billable hour targets have the potential to regularly conflict with the requirement to act in the client's best interest [...] Billable hours can be a significant reason as to why people do not feel included in the workplace.'*

[Source](#)

117. Not all regulators regulate firms. The draft statement of policy qualifies any expectation for regulators related to authorised firms in a way that ensures relevant expectations are applied only where applicable. In line with our responsibilities under the Act, the outcomes and expectations set out in our proposed statement of policy apply to legal services regulators, not directly to regulated professionals and authorised firms.

### **Encouraging diverse and inclusive leadership**

118. There is a growing body of evidence that suggests the importance of [diverse and inclusive leadership](#) to support equality, diversity, wellbeing and inclusive behaviours in organisations. This includes studies from [Buckinghamshire New University](#), [The Chartered Institute of Personnel and Development](#), and [the Bridge Group](#), as well as academic research in [organisation management](#) and [psychology](#). The Law Society's recently published [equality, diversity and inclusion strategy](#) has emphasised the

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<sup>4</sup> Although the Bridge Group's report focuses on socio-economic inclusion, the examples of effective practice are likely to be useful for delivering initiatives to support diversity and inclusion for wider groups.

importance of strengthening diversity in senior leadership, making this a key pillar in its strategy.

119. Where leaders champion efforts to encourage diversity in a firm, this sends clear and powerful signals to the wider organisation, encouraging both wider engagement and support. Leaders who actively involve a diversity of voices in decision-making create opportunities for growth and remove barriers that might prevent full participation in relevant initiatives. Inclusive leaders model the behaviours they expect to see in their workforces – such as actively listening to diverse perspectives, challenging bias where it arises, and fostering environments in which all employees feel safe, valued, and respected.

120. Steps to encourage inclusive leadership could include:

- undertaking appropriate training and skills building;
- making sure the practice is appropriately incentivised and measured;
- ensuring leaders model and embed principles of fairness, respect, wellbeing and inclusion in everyday behaviours and organisational culture; and/or
- empowering all employees to deliver on organisational objectives for advancing equality, encouraging diversity, and promoting wellbeing and inclusive professional cultures.

**Q5a.** Do you agree with the proposed Outcome 4?

**Q5b.** Do you agree that the proposed expectations will help regulators to pursue Outcome 4? Are there any further expectations beyond those we have included that would support regulators to pursue this outcome?

**Q5c.** Are there any enhanced expectations that would be better placed under core expectations under Outcome 4? Are there any core expectations that would be better placed under enhanced expectations under Outcome 4?

## Implementation and monitoring

121. Following the consultation, we will analyse the responses received and finalise our proposals and then publish our response and issue the final statement of policy.
122. Subject to consultation and the publication of our final statement of policy, we recognise that regulators will need sufficient time to meet the expectations in pursuing the outcomes, particularly where consultation is required to make changes to regulatory activities or system changes and/or changes to data collection are required. Therefore, we are proposing a phased implementation timeline, as set out in the table below. We propose to use the LSB's Regulatory Performance Assessment process during the implementation process, to help inform our understanding of regulators' compliance status, and measure longer term changes through diversity data sets and regulators' findings from evaluation activities. This is an indicative timeline, and we would encourage regulators to achieve key milestones earlier than anticipated if possible.

Proposed implementation timeline	
<b>Phase 1 (0-3 months post publication of final statement)</b>	The LSB works closely with regulators to ensure a clear understanding of the aims and expectations of the statement of policy.
<b>Phase 2 (3-6 months post publication of final statement)</b>	Regulators assess current activity against the outcomes and expectations to identify gaps and set out clear plans that show how and when regulators will meet the core expectations and, where relevant, enhanced expectations.
<b>Phase 3 (12 months post publication of final statement)</b>	Regulators will be able to demonstrate that they have taken or are planning to take effective steps to pursue the outcomes by meeting expectations (including, where relevant, the enhanced expectations) in the statement, with time-bound plans to meeting these within a reasonable timeframe if not yet met.

123. Some regulators may benefit from further guidance and support to enable compliance with our draft statement of policy. We, therefore, are seeking views on whether the LSB could take any further action to support compliance. This could be through formal guidance and/or informal resource and best practice sharing that could be provided alongside the final statement of policy.

**Q6a.** Do you agree our proposed timelines for implementation are achievable?

**Q6b.** Are there any reasons why a regulator would not be able to meet these milestones? Please explain your answer.

**Q6c.** Do you have views on whether and how the LSB could take additional steps to support compliance with the proposed statement of policy (e.g., through either formal or informal outputs, such as guidance and/or other relevant resources)?

## Equality Impact Assessment

124. In accordance with the Equality Act 2010 and the [Public Sector Equality Duty](#) (PSED) under it, we have given due consideration to how this proposed statement of policy may impact those who may experience inequality on the grounds of their protected characteristics under the Equality Act 2010.
125. Our evidence-based proposals are intended to encourage diversity. Given the nature of the proposals, we consider that, overall, this policy statement is likely to have a significantly positive impact on equality. This document and our discussion on the evidence base ([Annex B](#)) clearly set out the problems we are trying to address, as well as how our proposals will support improved behaviours, practices and strategies to advance equality in the profession. We will review this assessment following the consultation, where appropriate, to address any additional evidence or information we receive.
126. We recognise that the proposed statement of policy will be implemented practically by regulators and that the equality impacts will therefore principally depend on the specific activities the regulators choose to undertake to implement the policy. Our assessment reflects this.
127. Regulators are best placed to assess and quantify the impacts of the specific activities they decide to pursue to adhere to the proposed statement of policy, noting the proposed approach allows for targeted, risk-based regulation. As public bodies and bodies administering public functions, regulators must also give due consideration to the equality impacts of their activities, in accordance with the Equality Act 2010 and the PSED. Our draft proposals emphasise the importance of robustly assessing any potential equality-related impacts of both new and substantively amended policy proposed by regulators and we will expect regulators to demonstrate the steps they have taken to assess and mitigate identified risks to equality. This will ensure that both negative and positive impacts arising from regulatory activities are identified and addressed as required.
128. More widely, it is in the consumer and public interest that the profession reflects the diversity of the society that it serves and that its work culture fosters inclusive and healthy practices.

**Q7a.** Have you identified any equality impacts (both positive and negative), we haven't considered which, in your view, may arise from our proposed statement of policy?

**Q7b.** Do you have any evidence relating to the potential impact of our proposals on specific groups with certain protected characteristics, and any associated mitigating measures that you think we should consider?

**Q7c.** Are there any other wider equality issues or impacts that we should take into account and/or any further interventions we should take to address these in our proposed statement of policy?

## Impact assessment

129. Our policy approach is intended to ensure that diversity outcomes are pursued within the LSB's regulatory approach and that there is broad consistency and accountability in the measures that are adopted across the sector. We have prepared a draft statement of policy which proposes to provide regulators with flexibility to use a range of regulatory arrangements and other appropriate activities in pursuing the four outcomes. We consider that this document and our more detailed discussion on the evidence base ([Annex B](#)) clearly set out not only the problems we are trying to address, but also the clear benefits the proposals are likely to produce for the profession, consumers, and sector and economic growth.
130. Regulators are best placed to assess and quantify the specific impacts on their regulated communities and consumers based on the activities they decide to pursue to adhere to the statement of policy, noting the proposed approach allows for targeted, risk-based regulation. We expect regulators to undertake their own evidence-based impact assessments of the activities they pursue.
131. We have had regard to the better regulation principles in our development of the proposals and consider that the draft statement of policy is a proportionate, consistent, transparent, targeted and effective means of meeting the regulatory objectives in the Act, particularly the objective to encourage an independent, strong, diverse and effective profession.
132. We welcome comments, particularly from regulators, on the potential impact of the draft statement of policy and any quantification of the likely costs and anticipated benefits, to further inform our assessment of the regulatory impact of the proposed policy.

**Q8.** Do you have any comments on the potential impact of the draft statement of policy, including the likely costs and anticipated benefits?

## Further steps to encouraging a diverse profession

133. We believe that our proposals, if implemented, will provide an effective regulatory approach to encouraging a diverse profession. However, we are also aware that long-term and sustainable culture change in the profession may require the LSB to go beyond the statutory tool of a statement of policy.
134. As oversight regulator, we are well placed to provide leadership in the sector on this issue. We are keen to identify appropriate and effective steps we could take to encourage diversity, whether these are taken by us independently or in partnership with others within and beyond the legal services sector. We are, therefore, seeking views from respondents to the consultation on steps we could take alongside setting expectations for regulators in our draft statement of policy.

**Q9a.** Do you have any comments on how the LSB, either independently and/or in partnership, might develop further measures alongside the proposals set out in the consultation to encourage a diverse profession?

**Q9b.** Do you have any views on whether the LSB could take additional steps alongside setting expectations for regulators in the draft statement of policy to encourage a diverse profession? If yes, please share your reflections on the most appropriate and potentially effective routes the LSB could take to achieve this.

**Q9c.** Do you have any further comments on our proposals that you would like to share?