

Annex A: Update by regulatory bodies on actions taken against the diversity outcomes and expectations set by the LSB in 2019

Overview

This document provides a summary of actions taken by regulatory bodies against the four outcomes contained in the LSB [Guidance for legal services regulators on encouraging a diverse workforce](#), published in February 2017.

The actions reported in this Annex are based on progress reports provided by regulators in May or June 2020. They cover two areas:

- (i) Actions taken in response to the expectations that the LSB set for regulators in January 2019 when we published our last report on progress against the outcomes in our diversity guidance.
- (ii) Reported performance against our 2020 characteristics of **well-performing regulators**

Recognising the increasing emphasis from the Board that more focus was needed, but working within the current outcome framework, in January 2020 we introduced three criteria to clarify what we believe good regulatory performance looks like on equality matters.

Regulatory bodies should have:

- a. An understanding of the composition of their regulated community;
- b. An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness; and
- c. Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.

Bar Standards Board (BSB)

Summary of LSB expectations for BSB in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> • Implementation of equality impact assessments (EIAs). • To be informed of decision to develop the Race Equality Task Force and if developed its impact. • BSB to provide to LSB its responses to BSB consultation on the potential change in the rules for barristers that would allow aggregated and anonymised data on sexual orientation and religious beliefs to be published, as soon as practicable. 	<p>BSB undertook an audit of equality impact assessments (EIAs) and EIAs are now embedded in all programmes and projects.</p> <p>The terms of reference of the Race Equality Task Force (RETF) were agreed in June 2019 and have been published. The RETF has also been involved in supporting the BSB work on developing strategy, conducting research into E&D, and developing relationships with other E&D networks.</p> <p>In July 2019 the LSB approved a rule change application by the BSB to remove the restriction on the reporting of diversity data relating to sexual orientation and religion or belief unless all members of the workforce provide consent. As part of that application the BSB provided a summary of the consultation responses.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> • To be informed of outcomes of the project to evaluate the effectiveness of BSB's existing equality rules. • BSB to provide to LSB the evaluation of the impact of the resources BSB has developed for diverse consumers, as soon as practicable. 	<p>BSB has undertaken a programme of work to evaluate the effectiveness of its existing equality rules. The next phase of work (to engage further with stakeholders and consider amendments to the rules) will run until 2022.</p> <p>BSB has published a number of guides for consumers of immigration and asylum services along with the SRA.</p> <p>It has not concluded its evaluation of the impact of the resources it has developed for diverse consumers.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> • To be informed of the impact of the E&D strategy on the diversity profile of the bar the outcome of the research and how it will be implemented. • To be informed of the outcome of the research to assess how training providers' equality policies can have a positive impact on the diversity of students and how it will be implemented. 	<p>BSB's most recent report indicates that diversity continues to slowly increase at the Bar in certain respects, in particular in relation to women and for those from BAME backgrounds, especially at entry level to the profession. The BSB has noted that it will establish the impact of its E&D strategy by embedding EIAs across its activities, with specific evaluation programmes in key areas of work.</p> <p>Analysis of training provider E&D policies will conclude in August 2020 which is expected to inform decisions on further research. Initial research was staggered and timed to begin after introduction of the new bar training courses.</p>

Summary of LSB expectations for BSB in 2019	Actions taken
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> To be informed of the evaluation framework the BSB's research department is developing to measure impact of projects, how this will extend to diversity initiatives and detail about benefits and lessons learnt around using such a framework. 	<p>BSB notes that it has embedded evaluation into all project planning as well as carrying out evaluation of specific programmes such as Future Bar Training. The annual 'Diversity at the Bar' report monitors changes in the makeup of the profession, including at the junior and senior levels. Projects then focus on addressing issues of representation, retention and progression of different groups.</p> <p>A baseline data set was established for the <i>Addressing bullying and harassment at the Bar</i> initiative.</p>

Characteristics of well-performing regulators: BSB	Response
<p>a) An understanding of the composition of their regulated community</p>	<p>BSB has presented evidence that it has an understanding of its community and has set out its approach to annually gathering and analysing its data and identifying trends over time. The BSB publish a report every year, which details the response rates to all diversity monitoring questions set by the BSB. The BSB have high levels of response rates for ethnicity, gender and age. Although lower, rates of response for all other protected characteristics are improving every year. No overall survey response rate is published.</p>
<p>b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness</p>	<p>BSB has carried out research, held events and published reports on a number of areas influencing entry to the profession and progression.</p> <p>A four-year evaluation programme is underway on Future Bar Training (entry to the profession).</p>
<p>c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.</p>	<p>BSB has data on differential impact for every year on gender and ethnicity, which is referenced in a published research report. BSB had firm conclusions for complaint outcomes, which showed no differential for ethnicity but a small differential for gender (which led to policy changes). Conclusions for complaint likelihood could not be accurately drawn due to lack of data.</p> <p>BSB has continued to analyse the data and plans to publish the next report with all data up to the end of the 'old' enforcement regime. BSB expects to publish an updated research report in the autumn 2020.</p>

CILEx Regulation (CR)

<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> CR to consider how to increase the overall response rate of 26.5%, through the introduction of the new Customer Relationship Management system (CRM) in 2019 or other strategies. CR to consider how to use analysis to encourage diversity in the identified areas of concern. 	<p>CR's most recent survey achieved a response rate of 40%. CR is focusing initiatives on the areas of most need and has identified groups such as those from less-advantaged social backgrounds, women, BAME and people with disabilities.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> CR to provide results of the work to identify the reasons why BAME members are underrepresented in the chartered legal executive grade relative to the graduate grade CR to explain how it uses above to inform policy development and to evaluate the effectiveness of CR's regulatory arrangements. 	<p>The research carried out had a low response rate preventing CR drawing meaningful conclusions on reasons but there is a consistently higher number of BAME rejections on application. CR has not set out specific actions that it will take in response to underrepresentation.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> CR to update LSB in future about the opportunities CR has considered to deliver a joint initiative with CILEX, and for facilitating a shared understanding of diversity issues within their regulated community. 	<p>CR and CILEx have set up a joint EDI forum and agreed minimum EDI data standard requirements and how to collect the data. CR has raised the profile of diversity within its regulated community through encouraging the inclusion of diversity on branch meeting agendas and the establishment of CILEx special interest groups.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> CR to inform LSB of how new website will contribute to CR's diversity work when it goes live in 2019. 	<p>CR upgraded its website in 2019 and increased its accessibility. The website now has functions to allow reading and translation to enable users with dyslexia, low literacy and those with mild visual impairments to access the content. CR continues to provide information to explain its commitment to diversity and to publish diversity reports.</p>

Characteristics of well-performing regulators: CR	Response
a) An understanding of the composition of their regulated community	CR has had an increase in its survey data response rate from 26.5% in 2017 to 40% in 2019. Analysis has been carried out on social mobility and female parity of opportunity, BAME, disability and schooling.
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	CR has presented limited data on barriers to entry and progression. It has agreed joint strategic priorities with CILEx on social mobility and parity of opportunity for female progression.
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	A review was carried out in September 2019 and looked at the data from 2016 to 2018. There were limitations due to the small data set. It did not identify any ethnicity disproportionality after 2017 but found some historic disproportionality prior to this.

Council for Licensed Conveyancers (CLC)

Summary of LSB's expectations for CLC in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> • CLC to provide evidence that it has considered the reasons for the decrease in responses in 2016 relative to 2013. • CLC to consider whether data collected through regulatory and operational processes can supplement the diversity data until the next full diversity survey in 2019. • CLC to improve its data collection to ensure it understands the diversity profile of the whole of its regulated community. • CLC to update LSB on response rates to the next diversity survey in 2019. 	<p>CLC provided evidence that it has reviewed the decrease in responses and is exploring options to increase participation to a level that will enable it to better support a robust evidence base.</p> <p>It had a 38% survey response rate for its 2019 diversity survey. Further research has been commissioned on why career progression issues for women and BAME lawyers persist.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> • CLC to update LSB on improvements on its data collection (as above) so that it has the relevant data to inform policy development. 	<p>CLC continues to include an assessment of the impact of all proposed policies on diversity and inclusion and these are provided to its governing Council.</p> <p>CLC is carrying out an evidence-gathering exercise looking at obstacles to career progression for all groups in the regulated community.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> • CLC to inform LSB of results of collaborative pilot this year with Business in the Community. • CLC to share the findings with the other regulators. 	<p>CLC updated the LSB and other regulators of the outcome of the 2018 pilot working with Business in the Community.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> • CLC to explain how it will account to stakeholders for its plans to implement the findings of its diversity and inclusion research and Annual report 2017. 	<p>CLC accounts to stakeholders on E&D through publishing research, Annual reports, at events and through newsletters and web content.</p>

Characteristics of well-performing regulators: CLC	Response
a) An understanding of the composition of their regulated community	CLC published its diversity monitoring research in 2019 which covers almost all protected characteristics (and achieved a 38% response rate).
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	CLC does not currently have robust data on barriers to entry and progression. It launched a call for evidence on barriers to entry and progression in April 2020. 133 respondents have replied so far. This will inform the review of the CLC Diversity and Inclusion Code planned for later this year.
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	CLC does not yet have this analysis. A review of regulatory actions began in February 2020 and analysis is not yet complete but is expected to be ready after the summer.

Costs Lawyer Standards Board (CLSB)

Summary of LSB's expectations for CLSB in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> CLSB to inform LSB of response rates of next full diversity survey in 2019. 	CLSB reported that the response rate for the 2019 Diversity survey was 23% which is a slight decrease from the previous year. It is moving from paper-based to online data collection, which it expects will support an increase in future response rates.
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> CLSB to provide examples of how the Board has considered diversity 	CLSB has provided evidence that the Board considers diversity issues.
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> CLSB to seek more opportunities to actively work and collaborate with other organisations on diversity initiatives. 	CLSB has pursued some collaboration with SRA, which regulates the entities at which many costs lawyers practice. CLSB noted due to the small size that collaboration is needed and is a combination of: work it leads for cost lawyers; participation in joint initiatives; and proactively leading on collaborations.
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> CLSB to review its guidance note on equality and diversity again in the future, to ensure it remains up to date and fit for purpose. 	In 2019 CLSB updated its guidance note on equality and diversity and moved the information onto the website.

Characteristics of well-performing regulators: CLSB	Response
a) An understanding of the composition of their regulated community	CLSB had a 23% response rate to its triennial diversity and inclusion survey in 2019, when it also published a compendium of five surveys from 2012 – 2019.
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	CLSB has noted what its views as the main barriers to entry and worked with the SRA on the case for diversity which includes details on dealing with the barriers to progression. With the reintroduction of the reformed entry qualification, CLSB has collected induction data from the January 2020 intake to inform future policies.
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	CLSB has noted that it has limited direct evidence of differential impact on protected characteristics within its enforcement procedures, given the small number of disciplinary proceedings.

Institute of Chartered Accountants in England and Wales (ICAEW)

Summary of LSB's expectations for ICAEW in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> ICAEW to inform LSB of future response rates to its next diversity survey in 2019. 	<p>The response rate was improved and all firms responded in 2019, achieved through a communications plan of potential regulatory action if firms did not respond:</p> <ul style="list-style-type: none"> a) 87% firms responded by the reporting deadline in 2019, up from 39% in 2017. b) Over 9,000 staff across 272 firms participated by the reporting deadline in 2019, up from 3,300 participants across 105 firms in 2017 c) 100% of firms responded in 2019 including late submissions <p>Diversity Advisory Group decided to implement wider diversity monitoring amongst members of ICAEW, intended to be implemented towards the end of 2020. It will cover a limited number of the protected characteristics, notably ethnicity, disability and social background.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> ICAEW to update LSB of findings of investigation into underrepresentation of the Afro-Caribbean community in firms and any proposed action. 	<p>ICAEW continue to evaluate the most appropriate initiatives to increase Afro-Caribbean representation through wider social mobility initiatives, taking into account the independent research of school leavers and the graduate market.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> ICAEW to assess the impact of current and planned diversity initiatives and to keep LSB informed of this. 	<p>ICAEW reports that the collation of data has only been in place for 2 to 4 years and therefore it sees it as difficult to identify the impacts and outcomes from the initiatives that are currently in place. It is aiming for a clearer picture from 2023.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> ICAEW to make diversity infographic more accessible on its website. 	<p>ICAEW report that its probate landing page now holds 2019 diversity survey results.</p>

Characteristics of well-performing regulators: ICAEW	Response
a) An understanding of the composition of their regulated community	<p>[Note: ICAEW did not provide specific responses to the three areas and therefore information has been drawn from responses to the actions in the table above].</p> <p>ICAEW's last diversity monitoring exercise were summarised in a report issued in May 2019. This contains a detailed analysis of the sector and draws out a range of key findings.</p> <p>Since 2017, there was a reduction in the trend of those unwilling to disclose answers to certain questions.</p>
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	<p>ICAEW presented what it has done to understand the barriers to entry and has a number of initiatives to mitigate these effects such as: development of women in finance and leadership development programmes; development of degree apprenticeships; development of bursaries; and a number of awareness raising activities.</p>
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	<p>At present the Professional Standards team does not have procedures in place to monitor the diversity of the complaints and disciplinary process or the diversity of those making complaints.</p> <p>Professional Standards will consider its approach in light of the monitoring initiatives in 2020/21 and the flexibility of the IT systems to hold such data.</p>

Intellectual Property Regulation Board (IPReg)

Summary of LSB's expectations for IPReg in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> IPReg to provide any general updates on progress. 	<p>A new CRM system has recently been introduced which should enable it to gather more comprehensive data about the diversity of the profession than it has previously been able to. A standalone exercise to collect data is planned for 2020 but due to the impact of the Covid-19 pandemic this may not be possible.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> IPReg to update on areas of underrepresentation identified as a consequence of improvements in data reporting (once received) and set out its diversity initiatives to target these areas. 	<p>The lack of available data has prevented IPReg fulfilling this action as planned, although some initiatives have been progressed; for example it removed a 25% cap on non-interactive CPD activities which it identified as creating a potential barrier for those with particular diversity characteristics.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> To keep LSB informed of progress of Generating Genius and its funding and to share any lessons from this with others 	<p>IPReg has made donations to IP initiatives to improve E&D, including IP Inclusive. It has not funded Generating Genius in the period since the last update to the LSB (May 2018), however, it has reserved funding for other diversity initiatives in the future.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> IPReg to provide any general updates on progress. 	<p>IPReg has signed the IP Inclusive Charter, which includes a number of commitments to supporting equality, diversity and inclusion.</p>

Characteristics of well-performing regulators: IPReg	Response
<p>a) An understanding of the composition of their regulated community</p>	<p>IPReg plans to undertake a dedicated data capturing exercise in 2020. However, this will depend on how the Covid-19 crisis develops. If this exercise is not possible, attorneys will be asked to complete the information as part of the 2021 annual return process.</p>
<p>b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness</p>	<p>With improved data collection IPReg noted that it will be better placed to identify entry and progression barriers and determine any need for mitigation measures.</p> <p>The response rate for the latest survey is not known.</p> <p>IPReg is actively working with an education provider on broadening the current qualification entry pathway options. It will also continue to encourage new providers, particularly those who are able to offer alternative approaches such as online courses.</p>

Characteristics of well-performing regulators: IPReg	Response
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	Lack of data has meant analysis has not been possible.

Faculty Office (FO)

Summary of LSB's expectations for FO in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> FO to demonstrate the steps it has taken to being proactive in considering ways to make progress against all the outcomes, including engaging with the other regulators 	<p>FO has considered how to increase its understanding of the diversity of its regulated community in how it obtains data and confirms it will be making changes effective autumn 2020. It will be conducting its triennial survey using its new online database, NotaryPro.</p> <p>FO has learned from other regulators to establish a proportionate approach to gathering diversity data and will require a mandatory return from 2020 as part of its PCF renewal process.</p> <p>Its previous survey response rate is 88% (2017), which was based on a voluntary, paper-based collection of data.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> FO to have further developed policy and/or regulatory arrangements to show progress against this outcome, in particular how it intends to attract new and younger entrants to the profession. 	<ul style="list-style-type: none"> Data shows that the September 2020 intake for the UCL course (pathway for entry to the profession) is almost at capacity, and the FO says it appears applications have come from younger and a more diverse range of applications. FO has undertaken reviews into barriers to entry into the profession and how to attract new and younger entrants to the profession but is waiting to understand the impact of Covid-19 before taking further steps. Challenges include the capacity of existing pathway.
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> FO to show collaboration with other regulators will provide an opportunity for it to learn how it can encourage a diverse workforce by improving its ability to collect data on its regulated community, and ensure this is used to inform policy development. FO to inform LSB of outcome of engagement with the Notaries' Qualifications Board to promote and encourage diversity in recruitment 	<p>FO will collect diversity information at the same time as the PCF is levied as a result of experiences shared at the Regulators Forum.</p> <p>FO has published the paper that was presented to the Master from the working group considering barriers to entry in the profession. Recommendations are under consideration.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> FO to account to stakeholders for its achievements and plans for any policy work with a diversity focus or any work that has been informed by the diversity data collected 	<p>FO is redeveloping its website to improve access to information. It publishes its annual report now, as well as diversity and equality data.</p>

Characteristics of well-performing regulators: FO	Response
a) An understanding of the composition of their regulated community	<p>FO is building its database of information through its recently introduced online registration service, NotaryPro (it previously relied on paper-based collection). Diversity data will be collected through a triennial review to be issued in Autumn 2020 through the portal and linked to PCF renewals, which means that a return must be filed.</p> <p>The previous voluntary survey in 2017 returned an 88% response rate.</p>
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	<p>A working party was convened in 2019, which presented a paper to the Master considering the barriers to entry in the profession and ways to address them. A number of additional routes to entry are now under consideration. FO will explore with CLC possible routes for Licensed Conveyancers to qualify as Notaries and a change in qualification rules has resulted in a number of applications from Chartered Legal Executives.</p> <p>FO has stated that progression within the profession is a limited issue given notaries are predominantly sole practitioners.</p>
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	<p>The Faculty Office has very few disciplinary cases annually. It considers that it would be evident if there were a disproportionate impact on notaries within specific protected characteristic groups, particularly around gender, ethnicity and/or age both as regard the regulated population and complainants.</p>

Solicitors Regulation Authority (SRA)

Summary of LSB's expectations for SRA in 2019	Actions taken
<p>Outcome 1: Understanding the diversity profile of the regulated community</p> <ul style="list-style-type: none"> SRA to keep LSB informed of the impact of its disability inclusion work on future firm diversity data collections. 	<p>SRA undertook research and engagement with law firms and published further information relating to diversity and inclusion and the underrepresentation of disabled people in their regulated community and are currently developing a range of interventions including good practice guides and workshops.</p>
<p>Outcome 2: Using data to inform activity and approach</p> <ul style="list-style-type: none"> SRA to provide any general updates on progress 	<p>During 2019 the SRA published research that outlined the differential performance in relation to the proposed Solicitors Qualifying Exam (SQE) for those who were disabled and for BAME candidates. This data has informed its equality, diversity and inclusion risk impact assessment of the SQE and informed work on reasonable adjustments.</p> <p>SRA is undertaking work to explore the reasons for the pattern of differential attainment in professional assessments in many sectors.</p>
<p>Outcome 3: Collaborating with others</p> <ul style="list-style-type: none"> SRA to provide LSB with the action plan the SRA is developing in response to the increase in reports of sexual harassment as soon as possible 	<p>SRA reported to the LSB on their action plan in 2019. The action plan comprises a number of steps to manage the increased reports of sexual harassment and inappropriate use of NDAs.</p> <p>SRA continues to undertake a number of further actions to raise standards in relation to E&D in the profession via a collaborative approach to promoting diversity with firms and stakeholders and ongoing collaborative partnerships with regulatory bodies and other organisations.</p>
<p>Outcome 4: Accounting to stakeholders</p> <ul style="list-style-type: none"> SRA to share any lessons from developing E&D and its approach to evaluating E&D, with other regulators. 	<p>SRA is undertaking to develop a framework for measuring E&D.</p> <p>SRA adopted a corporate reporting scorecard in 2019 which reports performance information, including about diversity, in relation to external, delivery, internal and financial perspectives.</p>

Characteristics of well-performing regulators: SRA	Response
a) An understanding of the composition of their regulated community	SRA has presented evidence of the understanding it has of its community and has a well-established approach to gathering and analysing its data and trends over time. Its firm survey response rate is 96%.
b) An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness	SRA had carried out a study into entry to the profession and also carries out analysis of progression effects and trends. SRA also works with a range of other bodies and groups to encourage greater diversity.
c) Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.	SRA has recognised the need to monitor the profile of those subject to disciplinary procedures and to develop a better understanding of differential impacts identified. Its data for 2018/19 will be published later in 2020 and annually thereafter. It notes the structural difficulties with the way that information is received from entities who carry out disciplinary actions. Further work to help develop its understanding of disproportionality in regulatory processes is planned for 20/2021.