

Response to the public consultation on the LSB's proposed statement policy

The Bridge Group

The Bridge Group is an independent research charity promoting socio-economic inclusion through evidence, insight, and collaboration. Our vision is an education system and a labour market where background is no barrier—and everyone, wherever they started in life, has the chance to realise their potential. To achieve this, we work with organisations across sectors, asking the right questions, uncovering what works, and turning data-led insights into meaningful change. While our primary expertise is focused on socio-economic background, we recognise that true inclusion cannot be achieved in isolation; we therefore consider socio-economic diversity within the broader, intersectional framework of diversity, equity, and inclusion.

We are participating in this consultation because our decade of research, including foundational work with the Solicitors Regulation Authority (SRA), as well as our work with the Legal Services Board (LSB), Bar Standards Board (BSB), CILEx Regulation (CRL), Institute of Chartered Accountants in England and Wales (ICAEW), and our collaborative legal sector reports (2018, 2020 and 2025), gives us a unique, data-driven perspective on the barriers that still exist within the legal profession. As a long-standing partner to the LSB, we understand that while the sector has made strides in entry-level recruitment, the "progression gap" remains a significant hurdle. We are sharing our insights to help shape a regulatory framework that moves beyond checklists and instead focuses on the systemic, cultural changes needed to make the legal profession truly inclusive and representative of the society it serves.

The Bridge Group is part of the Social Mobility Alliance, a group of charities, businesses, young people and researchers with a shared vision for change, and our responses have been endorsed by our fellow Alliance members.

Overall Reflection and Q1

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?*

Across sectors, including the legal profession, a consistent pattern emerges in our Bridge Group research: while representation improves at the entry level, it stagnates at senior tiers, pointing to persistent structural barriers to progression. Despite notable improvements in data collection, partially driven by SRA mandates, disparities persist. This is largely due to the absence of strong accountability frameworks and necessary cultural reform. The current consultation offers a vital

opportunity to move the focus beyond monitoring representation and towards proactively addressing the systems of progression, cultural norms, and the underlying structural drivers of inequality.

Any regulatory reform must adopt a people-centred and ethical approach, recognising that diversity policy is fundamentally about lived experience, dignity, and building trust in institutions, rather than solely being a matter of compliance or performance metrics. Bridge Group research consistently demonstrates that an individual's sense of fairness, belonging, and psychological safety is shaped by how systems and policies operate in practice, not just how they are theoretically designed. Regulatory frameworks must be designed to reflect and address this practical reality.

The Bridge Group supports the proposed regulatory outcomes, which represent clear guidelines for addressing the barriers to encouraging a diverse legal profession. Drawing on our extensive research across the legal sector and the established socio-economic background data collection process mandated by the SRA since 2014, we agree that standardised expectations are one of the essential elements required for improving socio-economic inclusion. However, while capturing demographic data is an important first step, regulators should go further to hold organizations accountable for how this data is used to inform their practice, for instance, through regular updates on progress or action plans.

While entry-level recruitment has seen progress, our evidence indicates that progression gaps remain acute. We anticipate that the proposed core and enhanced expectations have potential to reduce progression barriers. We endorse this structured approach as it establishes a necessary regulatory floor, ensuring that SEB is treated as a core component of a diverse and representative legal profession.

Outcome 1: Strategic, Evidence-Based and Collaborative Action

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?*

Bridge Group cross-sector research indicates that while organisations have significantly improved data collection on socio-economic background, this has not consistently led to structural change in progression or senior representation. The expectations outlined are suitable for helping regulators pursuing Outcome 1. However, we suggest extending the core expectations to include explicitly requiring regulators to monitor not only recruitment but also retention and progression rates, disaggregated by demographic characteristics. Furthermore, we strongly recommend that regulators adopt the Social Mobility Commission's (SMC) 'main household earner occupation at age 14' question as the primary metric for socio-economic background ([SMC 2020](#)). This measure ensures that sector-wide data can be directly benchmarked against national datasets like the Labour Force Survey. By mandating this specific metric, all legal regulators will standardise their representation

expectations and provide firms with the data needed to identify and take action to address the 'progression gap'.

Our qualitative research in the legal sector ([Bridge Group 2025](#)) further reveals that informal sponsorship, subjective notions of "merit," and network-based allocation of work projects are key drivers of inequality often invisible in headline data. Given that individuals with various identities (intersection of socio-economic background, race and gender, etc.) encounter unique disadvantages, we propose that analysis that considers different aspects of identities at the same time, should be placed under enhanced expectations for Outcome 1. intersectional analysis, or the analysis of combined characteristics, should be placed under enhanced expectations for Outcome 1.

Ultimately, qualitative evidence should meaningfully shape regulatory priorities and intervention design, rather than simply contextualising quantitative findings. More generally, mixed-methods research, which combines quantitative and qualitative data analysis, provides the strongest foundation for developing and designing evidence-based interventions. We therefore recommend that explicitly capturing both quantitative and qualitative data insights, broken down by demographic, is mentioned as a core expectation for Outcome 1.

The Bridge Group's research highlights that achieving what is set out in Outcome 1 is inherently a collaborative endeavour, hence we support inclusion of collaborative work as a core expectation. Our leadership of large-scale consortia including the *Effective practices in socio-economic inclusion within the legal sector* research ([Bridge Group 2025](#)) and our work with PRIME, as well as with other sector-wide consortia, such as Progress Together ([2025](#)) and Access Accountancy, has demonstrated the importance and benefit of bringing stakeholders together. By aggregating data across multiple firms, such as the 210,000-employee dataset analysed for Progress Together, we provide the macro independent evidence base which guides socio-economic inclusion strategies. These collaborative models prove that when regulators and firms work together to standardise metrics and to share and exchange best practices, they can more effectively identify and dismantle the systemic barriers to socio-economic inclusion.

Outcome 2: Fair Regulatory Processes

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?*

Bridge Group strongly endorses Outcome 2. Evidence from our research in various sectors demonstrates that individuals' perceptions of fairness in formal processes are crucial for fostering trust, ensuring legitimacy, and promoting retention, particularly among people from lower socio-economic and minority backgrounds. Our qualitative research in the legal sector (for example: [Bridge Group 2018](#)) highlights that individuals from underrepresented groups frequently report facing increased scrutiny and lower assumptions of their competence, which significantly shapes their

experiences in the workplace. Therefore, codifying the requirement for regulatory approaches to actively support equity and fairness is a necessary step in neutralising these systemic biases.

Additionally, we suggest adding an enhanced expectation on publishing enforcement outcomes disaggregated by relevant demographics and to conduct thorough, longitudinal analysis of patterns in complaints and sanctions. Transparency in this area is the only way to ensure that disciplinary patterns are not inadvertently mirroring wider societal inequities.

Furthermore, an assessment of procedural fairness must extend beyond compliance with established rules; it must fundamentally consider the lived experience and impact of the processes on individuals. To address this, we suggest including developing and adopting a trauma-informed approach in disciplinary processes as an enhanced expectation for outcome 2. This can substantially strengthen fairness by ensuring that investigations and disciplinary hearings are conducted with an awareness of the stress and vulnerability participants may experience, prioritising safety, transparency, and clear communication to avoid causing further psychological harm. This approach would ensure that all communication, evidence-gathering methods, and decision-making processes are designed and implemented in a way that avoids inadvertently compounding stress or creating disadvantage for individuals working in the sector.

Outcome 3: Accessible and Flexible Pathways

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?*

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)?*

The Bridge Group strongly agrees with the proposed Outcome 3 and its accompanying expectations. While formal entry criteria have widened, our research (including, for example, recent reports [Bridge Group 2024](#), [Bridge Group 2025](#)), demonstrates that informal access routes and a reliance on existing professional networks continue to grant a significant advantage to individuals from privileged backgrounds. We endorse the current core expectations that require regulators to ensure qualification routes promote diversity; however, we emphasise that simply improving diversity at the entry-level is insufficient to achieve equitable representation in senior leadership. Realising this outcome requires a fundamental shift from "diversity as recruitment" to a systemic, demographic-based evaluation of the entire talent lifecycle, encompassing appraisal, promotion, and succession planning as just some examples, and backed by rigorous leadership accountability.

Regarding the distinction between expectations, we propose that an enhanced expectation should be added to specifically address the barriers faced by authorised persons re-entering the profession after prolonged absences. To gain a complete understanding of workforce dynamics, regulators should explicitly encourage organisations to analyse and publish patterns of attrition and re-entry, with a focus on those returning from health or caring-related breaks. By elevating this to a formal

expectation, the LSB can ensure that "accessible pathways" do not merely include the "front door" of the profession, but also the "revolving door," preventing the permanent loss of diverse talent whose career trajectories are interrupted by life events.

Outcome 4: Conduct, Competence and Inclusive Culture

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?*

The Bridge Group strongly supports the proposed Outcome 4. Our research in the legal sector highlights that meaningful progress in socio-economic inclusion requires sustained commitment and accountability at the senior leadership level, moving beyond isolated initiatives ([Bridge Group 2018](#), [Bridge Group 2025](#)). While clear professional standards against bullying, harassment, and discrimination are essential, they must be complemented by genuine cultural change and robust accountability mechanisms to be effective. We specifically endorse the proposed core expectations that require regulators to embed these duties into codes of conduct; however, we emphasise that management capability is often the deciding factor in whether a professional from an underrepresented background thrives or leaves.

In response to the balance between expectations (Q5c), we propose that inclusive leadership is recognised as a core professional competence, rather than an enhanced one, especially for individuals in supervisory or key decision-making roles. This shift is necessary because many identified wellbeing challenges in the sector are structural rather than individual; they are frequently rooted in workload norms, performance expectations, and entrenched informal workplace cultures. By establishing inclusive management as a core expectation, regulators can ensure that those with the power to shape "lived experience" are held to a standard that prioritises an inclusive and healthy workplace culture, directly addressing the systemic barriers to retention and progression identified in our research.

Further questions

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)?*

We advocate for the LSB to produce standardised guidance on SEB metrics (aligning with the SMC standards) to ensure consistency across the sector. Without this, there is a risk of fragmented data that cannot be benchmarked. We also suggest the LSB develops and provides a "Maturity Model" toolkit, helping regulators self-assess whether they are at a "Core" or "Enhanced" level of compliance.