

Survey Response Document

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

Confirmed

#00000106

Before you respond

This survey relates to the LSB's proposed statement of policy on 'Encouraging a diverse legal profession.'

We recommend you read [the consultation document](#) on our website before you respond.

For each set of questions in this survey, we have included a reference to the relevant paragraphs in the consultation document.

If you have any problems completing this survey, please email us on consultations@legalservicesboard.org.uk

Proposed statement of policy

These questions relate to **paragraphs 30-43** in the [consultation document](#).

We are proposing to issue a statement of policy under [section 49 of the Legal Services Act 2007](#) to encourage a diverse legal profession.

Our draft statement of policy sets out four outcomes which regulators must pursue:

- **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.

These outcomes are supported by core expectations (which all regulators are expected to meet) and enhanced expectations, recommended for greater impact (which regulators should also consider meeting).

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.

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?

Answer:

We broadly agree with these outcomes and support the work being done by the Legal Services Board, with an appreciation of the emphasis on socio-economic background alongside protected characteristics. The impact of naming socio-economic background is something we are strongly in favour of, as this will encourage regulators to include it explicitly in their approaches rather than focussing solely on frameworks centred upon the Equality Act.

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

Answer:

We support the use of core and enhanced expectations and would like to see the emphasis on measuring results and progress. We believe that this should be reinforced by providing resources to assist regulators and organisations with consistent and effective data collection, in order to ensure that this progress can be understood in its entirety. Furthermore, adding an emphasis on accountability in the public realm would be a clear and effective way to ensure that actions are taken to build inclusivity.

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?

Answer:

We support this structure so long as this is provided with effective guidance and monitoring. We agree that it is important to outline the key minimum requirements, and it is also important to highlight the value of additional steps to create a more inclusive environment. Additionally, these expectations will help regulators and organisations get ahead of the socio-economic duty which the Labour Government has committed to enact, providing a strategic advantage to authorities who prioritise inclusivity.

We also have some suggestions of where additional enhanced expectations could be added, as well as where we think enhanced expectations should be reallocated as core expectations, which we will detail in the following questions.

Outcome 1: Strategic, evidence-based and collaborative action

These questions relate to **paragraphs 44-58** in the [consultation document](#).

We propose that regulators must pursue the following outcome:

- **Regulators take strategic, evidence-based and collaborative actions to encourage a diverse legal profession.**

We are also proposing the following expectations under this outcome.

Under core expectations, we propose that regulators must:

- 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.
- Take further appropriate steps to identifying barriers to an equal, diverse, healthy and inclusive profession.
- Develop and publish evidence-based strategic action plans with SMART objectives, risk management, and evaluation.
- Ensure accountability at governing body level and report progress transparently.
- Work collaboratively with other regulators and stakeholders to share learning, harmonise data monitoring, and promote sector-wide consistency.

Under enhanced expectations, we propose that regulators should also consider:

- Horizon scanning for emerging barriers and opportunities (e.g., technology, demographic shifts, evolving consumer needs).
- 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.
- Designing and evaluating interventions with regulated communities; foster a culture of continuous improvement.

See our [draft statement of policy](#) for a detailed description of the proposed expectations.

Q2a. Do you agree with the proposed Outcome 1?

Answer:

We agree that any decisions taken should be informed by data, as this will help to reduce bias and keep solutions focussed on the most critical issues.

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?

Answer:

We appreciate the expectations are logical steps towards encouraging a diverse legal profession, however we feel that there are further areas to be considered and evaluated which could fit into the outlined framework to better pursue the outcome.

The Consultation Document refers to the struggle with low response rates “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...”. However, there is no explicit expectation within the framework that addresses these low response rates. We feel that it is important that the collection of this data is centred as a priority, and believe that a core expectation focussed on boosting response rates would be helpful in collecting useful and rich data sets.

The Consultation Document also correctly describes the value of qualitative data to complement qualitative findings, “qualitative data enables organisations to make more contextual choices suited to them and their workforce...Instead of measuring things with numbers, it explores meanings, feelings, and perspectives”. Given the nature of this consultation, we agree there is significant value in understanding individual and contextual factors. Therefore quantitative data should certainly be given appropriate consideration. As it stands, only quantitative measures are referenced in both the core and the enhanced expectations. Adding an enhanced expectation of collecting qualitative data would lead to more rounded findings and therefore more informed decision-making, giving appropriate space for regulators to understand the context of quantitative findings.

The Consultation Document also recognises the barrier that amongst the regulators there are inconsistent reporting timelines:

“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”.

We recognise that this inconsistency complicates matters when reviewing the progress made towards creating an inclusive sector, and believe that there is space for a core expectation to standardise reporting timelines in order to implement swift and straightforward approaches to data evaluation across the various bodies. This will also support the LSB in synthesising and aggregating this data across all regulators, as we have proposed in our response to question 9a.

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?

Answer:

Our primary response regarding Outcome 1 revolves around the additional expectations we see potential for, as outlined in Q2c. Therefore there are no movements between core and enhanced expectations that we would emphasise at this stage.

Outcome 2: Fair regulatory approaches and decision-making

These questions relate to **paragraphs 59-69** in the [consultation document](#).

We propose that regulators must pursue the following outcome:

• **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.**

We are also proposing the following expectations under this outcome.

Under core expectations, we propose that regulators must:

- Identify and address impacts on protected and other diversity characteristics (including socio-economic background) arising from new or updated regulatory policies or actions.
- Provide equality impact assessments when formally consulting.
- Take steps to ensure fairness in disciplinary and enforcement processes, including appropriate training, data analysis, remedial plans, and support for wellbeing of all parties.

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.

See our [draft statement of policy](#) for a detailed description of the proposed expectations.

Q3a. Do you agree with the proposed Outcome 2?

Answer:

Firstly, we are in full agreement with socio-economic background being listed alongside protected characteristics, especially in the context of the aim to encourage a diverse profession. Those from lower socio-economic backgrounds have often found routes into various aspects of the legal industry obstructed, therefore it is important to recognise this factor when considering diversity within the profession. We feel confident that this encompassing approach will prove beneficial for the Legal Services Board in achieving their outcomes, especially Outcome 2.

We believe Outcome 2 will be effective in the sense that it will keep regulatory bodies, and by extension the legal sector in general, in a strong position ahead of the incoming enactment of the socio-economic duty. This was an important promise in the government's 2024 Manifesto, and in November 2025 this was reinforced by The Rt Hon the Baroness Hallett DBE's Report into Core decision-making and political governance (Module 2, 2A, 2B, 2C Report - Core decision-making and political governance, <https://covid19.public-inquiry.uk/documents/module-2-full-report/>). This report explicitly recommended the introduction of the socio-economic duty, as well as outlining how socio-economic factors affect the lived experience of individuals, using the impact of Covid-19 to illustrate this.

Therefore, we see a clear advantage of Outcome 2 to be working to prepare regulators and the sector for the introduction of the socio-economic duty, and that the LSB is demonstrating proactivity over reactivity when it comes to the future of the sector.

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?

Answer:

We support the core expectations outlined in the consultation document and feel we would not be best placed to offer further expectations for this particular outcome.

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

Answer:

We support the core expectations outlined in the consultation document and feel we would not be best placed to offer further expectation for this particular outcome.

Outcome 3: Accessible, flexible and inclusive pathways into and through the profession

These questions relate to **paragraphs 70-82** in the [consultation document](#).

We propose that regulators must pursue the following outcome:

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

We are also proposing the following expectations under this outcome.

Under core expectations, we propose that regulators must:

- Ensure that training routes to qualification, approved by the regulator, are designed to support equality of access and encourage diversity, while maintaining professional standards.
- As applicable, set and monitor standards for authorised training, qualification and/or assessment providers that support diversity goals.
- Make relevant information publicly available to support candidates' informed decisions, including costs and outcomes.

Under enhanced expectations, we propose that regulatory should also consider:

- Where appropriate, publishing outcomes for legal training disaggregated by diversity characteristics.
- Collecting and publishing data on education and training background of authorised persons.
- Where applicable, encouraging firms to develop work placement and training programmes that foster diversity and inclusion.

See our [draft statement of policy](#) for a detailed description of the proposed expectations.

Q4a. Do you agree with the proposed Outcome 3?

Answer:

We strongly support the proposed Outcome 3, and would like to highlight the importance, especially in the legal space, of the sector being representative of the general public as a whole. The individuals who operate in this industry hold responsibility for implementing our laws, so diverse representation across the profession is essential to ensuring the law is applied fairly and equally.

We can also provide evidence to support the proposed Outcome 3, as upReach works to ensure fair and accessible pathways into professional environments, including within the legal sector. Our programmes provide personalised careers support to undergraduates from lower socio-economic backgrounds, and as such we are interacting with pathways into professions on a daily basis, and consistently advocating for measures to make access to all sectors more fair and transparent.

42% of people from less advantaged backgrounds have undertaken no work experience compared to less than a third (29%) of people from professional backgrounds (Boosting opportunity in the workplace, Totaljobs & The Social Mobility Foundation, 2021). When an industry places such an emphasis on demonstrating passion for a career through having spent time interning, shadowing, and gaining direct insight, it is crucial that access to these opportunities is evenly distributed.

To ensure internships and work placements are fair, inclusive, and genuinely educational, upReach recommend the following safeguards:

Open advertisement: Internships should be openly advertised, working against traditional notions that internships should be exclusively offered to people already connected to employers. Through inclusive and open advertisement, potential candidates from all backgrounds can have the opportunity to apply for these opportunities, building a stronger candidate pool for employers and a greater access to opportunities for applicants.

Full-time treatment and statutory benefits: Interns should be treated as full-time staff for the duration of their placement and be paid for their work and time. Treatment should extend beyond this, with entitlement to statutory benefits such as sick pay, holiday leave, and other workplace protections. This ensures financial and employment fairness and prevents disadvantage for those who cannot afford to work without pay.

Structured supervision and clear policies: Interns should have an assigned line manager responsible for mentoring, guidance, and feedback. Transparent workplace policies should clearly outline expectations, responsibilities, and rights, ensuring accountability and consistency.

Adequate resources: Interns must be provided with the tools and resources necessary to perform their role effectively, including access to laptops, software, or other job-specific equipment.

Financial support and accessibility: Students should receive financial support for mandatory placements, reimbursement for travel to in-person interviews, and virtual alternatives where possible.

Reasonable adjustments: Employers should accommodate interns with caring responsibilities, disabilities, or other commitments to ensure equitable participation.

Clear standards and enforcement: Clear definitions of what constitutes legitimate educational content in work placements are essential. Robust enforcement mechanisms should be in place to prevent misuse of educational exemptions, particularly in sectors that rely heavily on placement learning. In some cases, internships currently classified as “educational” should be treated as paid positions with structured learning components; students should receive adequate financial support to remove barriers that disproportionately affect those from lower socio-economic backgrounds.

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?

Answer:

We believe a core expectation to help regulators pursue Outcome 3 should be to ensure that work placement and training programmes are openly advertised and paid. We have evidence to support the impact of this, and can demonstrate that this would be effective in overcoming some of the noted barriers, including the value of networks and accessibility of opportunities.

Access to meaningful work experience is one of the most significant factors in securing graduate employment, yet it remains deeply unequal. 2025 research from the Sutton Trust reveals that those from working-class backgrounds are 20 percentage points less likely to undertake an internship than their middle-class peers, with the gap widening substantially since 2018 (Unpaid and underpaid internships, The Sutton Trust, 2025).

The challenge is compounded by the prevalence of unpaid or underpaid placements. In 2024, 61% of internships were either unpaid or paid below minimum wage, effectively locking out students who cannot afford to work for free or relocate without proper compensation. Students from lower socio-economic backgrounds are also a significantly more financially risk-averse group, and therefore are unlikely to outlay substantial costs without assurance of recompense.

upReach's own in-house data demonstrates the long-term career impact of quality work experience:

69.8% of students who completed an exclusive internship through the charity secured a graduate role, compared to just 43.9% of those who did not - a 26 percentage point difference that can transform graduate career trajectories. This data is centred upon upReach RISE Programme participants who graduated between 2014-2025.

Separately, we would support the addition of an enhanced expectation to implement programmes or initiatives specifically designed for those from underrepresented backgrounds, in order to make pathways more accessible and create diversity within the legal profession.

In order to demonstrate the value of such initiatives, we can consider the Civil Service Summer Internship. This is an example of a space where it is of the utmost importance that the workforce is representative of the public that it serves, and as such creating accessible pathways and encouraging a diverse profession should be treated as a priority.

Pat McFadden, Chancellor of the Duchy of Lancaster, said:

"We need to get more working class young people into the Civil Service so it harnesses the broadest range of talent and truly reflects the country. Government makes better decisions when it represents and understands the people we serve. I want to open up opportunities for students from all backgrounds, and in every corner of the UK, so they can take a leading role at the heart of government as we re-wire the state and deliver the Plan for Change."

This represents a clear identification of an issue of a lack of social mobility within the civil service, and a clear action to counter this through access and promotion of opportunities to people who previously have been excluded. This is a format which could be replicated in the legal sector, and incorporating these initiatives into the expectations framework could add motivation and accountability across the sector.

There are clear examples of this format being effectively implemented within the legal space, with programmes such as PRIME and Pathways to Law(The Sutton Trust) providing school-aged students from lower socio-economic backgrounds with access to work experience in partnership with a wide range of leading law firms. This focus on access and insight is key to ensuring that young people can recognise the opportunities within the legal sector which can be available to them. Moreover we can point to our own work with Slaughter and May on the Law Springboard Programme, which provides undergraduates with employability support, work experience opportunities, and mentorship from a leading law firm - enabling them to make informed, intentional career decisions and understand the steps required to break into the legal profession. Feedback from the 2024 cohort of the Law Springboard Programme shows that 98% of participants felt this experience helped them make a more informed decision about their career.

A more widespread focus on opportunities such as these, including school students and undergraduates, would benefit the sector by widening the applicant pool and encouraging a diverse and inclusive employee-base. Therefore we believe that establishing, or collaborating with organisations (such as the Sutton Trust or upReach) to build programmes that improve access would serve as an effective enhanced expectation with a track record of success and advantages for the legal profession.

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?

Answer:

Whilst we are glad to see data publishing included in the expectations, we believe it could be better placed in core expectations. This is due to the value of data publishing in holding organisations accountable for taking effective steps towards creating more inclusive environments.

When considering the gender pay gap, we can see an example of this accountability and raising of awareness of the barriers which exist, inspiring more direct action. We believe that if this approach was echoed across other protected characteristics and socio-economic background, this would result in impactful change.

upReach strongly advocates for consistent enforcement mechanisms across gender, ethnicity, disability, and social economic pay gap reporting. The evidence overwhelmingly demonstrates that enforcement is a critical driver of systemic change, particularly in business environments where commercial priorities often take precedence over voluntary social initiatives.

In profit-driven environments, voluntary compliance consistently underperforms compared to mandated requirements. Organisations prioritise resources and attention based on regulatory obligations and compliance risks, meaning that without enforcement mechanisms, pay gap reporting

risks becoming an activity that receives insufficient attention, resources, or commitment to meaningful change. Gender pay gap reporting requirements demonstrate that enforcement drives systematic progress, providing a proven success model that should be replicated across all protected characteristics - including socio-economic background - to ensure equitable treatment and outcomes.

Government or regulatory mandates significantly reduce employee concerns around data sharing, addressing a critical barrier to effective reporting. When reporting is voluntary, employees may reasonably fear that demographic data could be used against their interests or career prospects. Mandatory reporting creates a neutral, standardised environment where participation is normalised

rather than potentially stigmatised. This approach typically achieves substantially higher participation rates because it removes the burden of individual choice and potential negative consequences, encourages participation, and establishes clear legal protections for data sharing.

Applying different enforcement standards across protected characteristics creates an implicit hierarchy of importance that undermines the principle of equal treatment. Consistent enforcement

demonstrates genuine commitment to addressing all forms of workplace inequality and enhances public confidence in the reporting system by ensuring that data is accurate, comparable, and actionable. This unified approach is essential for maintaining the credibility and effectiveness of the entire pay gap reporting framework.

When considering the Social Mobility Index, it is clear to see that firms who consistently perform well, especially within the legal sector, also routinely publish information pertaining to their socio-economic data and targets. This suggests that when firms are incentivised and held accountable, they are more likely to make meaningful progress toward a more diverse profession.

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)?

Answer:

We appreciate the overall motive behind Outcome 3, and believe the actions detailed will address key barriers in creating a diverse profession. However, we would like to draw further attention to the multiple stages of access to the legal profession.

Much of the consultation appears focussed upon inclusivity for those already within the profession, or those on Training Programmes designed to facilitate this access. We would like to highlight that the courses required to qualify in the legal sector (the SQE and the Bar Course, for example) actually fall quite a distance into a person's journey to build a legal career, as initial access begins with first-point exposure and insight into how the legal space operates as a career path.

From the outset, outreach efforts should target the widest possible audience. Insight and work experience opportunities should be openly advertised and accessible to people from all backgrounds, reinforcing the goal of building a legal profession that truly reflects the society it serves.

Within this, we would advocate for application processes for all opportunities within the legal space to be focussed on fairness and accessibility, providing a space to request and receive any reasonable adjustments that may relate to individual circumstances, caring responsibilities, and financial hardship. The application processes should be financially accessible, with any associated costs stemming from the application being reimbursed, and any work being fairly paid. Our response to Q4a outlines in further detail how these opportunities can be constructed to be inclusive for all. This should exist as a core expectation, as access into the profession is undeniably linked to the future of the profession as an inclusive space that is representative of the wider population.

Outcome 4: Professional conduct and competence

These questions relate to **paragraphs 83-120** in the [consultation document](#).

We propose that regulators must pursue the following outcome:

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

We are also proposing the following expectations under this outcome.

Under core expectations, we propose that regulators must:

- 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.
- Provide practical guidance and resources to support compliance.
- 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.
- Have and monitor additional standards and competence requirements for managers to ensure fair, compassionate, and inclusive management.
- Support authorised persons and regulated persons in firms to identify and use appropriate channels to raise concerns about conduct.
- Where applicable, require authorised firms to understand and address diversity gaps and wellbeing and inclusion challenges, and to report on these to the regulator.
- 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.

Under enhanced expectations, we propose that regulators should also consider:

- Where applicable, encouraging and supporting authorised firms to promote diversity in leadership and inclusive leadership practices.
- Where applicable, encouraging and supporting authorised firms to develop and implement evidence-informed strategic plans for fair, diverse, healthy, and inclusive environments.

See our [draft statement of policy](#) for a detailed description of the proposed expectations.

Q5a. Do you agree with the proposed Outcome 4?

Answer:

We see no areas for concern, although acknowledge that this is not our area of expertise.

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?

Answer:

We have no additional expectations to propose beyond those set out in the consultation.

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?

Answer:

We have no comments on the proposed allocation of core and enhanced expectations under this outcome.

Implementation and monitoring

These questions relate to **paragraphs 121-123** in the [consultation document](#).

We are proposing a phased implementation timeline, as set out below.

- **Phase 1 (0-3 months post publication of final statement):** The LSB works closely with regulators to ensure a clear understanding of the aims and expectations of the statement of policy.

- **Phase 2 (3-6 months post publication of final statement):** 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.

- **Phase 3 (12 months post publication of final statement):** 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.

We are also 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?

Answer:

While we would encourage the LSB to seek input from regulators to ensure the timelines are realistic, we would also caution that any significant extension to the implementation period risks diluting the impact of the proposals. It is important to keep up momentum during this process of change, and we would encourage the LSB to remain firm on timelines as far as is reasonably possible.

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

Answer:

We would defer to regulators themselves to provide a more informed response on this question, as they are best placed to assess their own capacity and any operational constraints that may impact their ability to meet the proposed milestones.

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)?

Answer:

We believe compliance would be supported by two things:

-Clear guidance on how regulators should measure and demonstrate progress against the four outcomes. The consultation sets out what regulators are expected to achieve, but without clearer direction on how progress should be assessed, different regulators are likely to approach this in different ways. This would make it difficult for the LSB to compare performance consistently across the sector or hold regulators accountable.

-Practical resources to help regulators make their data collection processes more consistent and accessible. We welcome the consultation's reference in paragraph 53 to the Social Mobility Commission as a source of guidance on collecting socio-economic background data. This is a useful framework, but we would encourage the LSB to also directly provide, or signpost to, practical resources that make data collection processes more consistent across regulators. Consistency in how data is collected will be key for drawing the meaningful cross-sector analysis we have called for in our response to Q9b.

Equality Impact Assessment and Impact Assessment

These questions relate to **paragraphs 124-128** (Equality Impact Assessment, q7) and **paragraphs 129-132** (Impact Assessment, q8) in the [consultation document](#).

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?

Answer:

We do not have specific evidence to contribute on equality impacts because our expertise lies in addressing socio-economic inequality. However, we would encourage the LSB to maintain its focus on socio-economic background, which is at a higher risk of being neglected in frameworks that focus more heavily on the Equality Act's protected characteristics.

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?

Answer:

We do not have specific evidence to contribute on equality impacts because our expertise lies in addressing socio-economic inequality. However, we would encourage the LSB to maintain its focus on socio-economic background, which is at a higher risk of being neglected in frameworks that focus more heavily on the Equality Act's protected characteristics.

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?

Answer:

We do not have specific evidence to contribute on equality impacts because our expertise lies in addressing socio-economic inequality. However, we would encourage the LSB to maintain its focus on socio-economic background, which is at a higher risk of being neglected in frameworks that focus more heavily on the Equality Act's protected characteristics.

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

Answer:

We welcome the direction of the draft statement of policy, in particular its focus on socio-economic background. We consider its potential benefits to be significant, particularly if the proposals are implemented with consistency and rigour across all regulators.

We do not have anything to contribute with regards to costs and would defer to regulators and other stakeholders better placed to quantify these. However, we would argue that the long-term benefits of a more diverse profession, in terms of public trust, economic outcomes, and the sustainability of the sector, will substantially outweigh any short-term implementation costs.

Further steps to encouraging a diverse profession

We are also seeking views from respondents to the consultation on steps we could take alongside setting expectations for regulators in our [draft statement of policy](#).

You can read the details about these plans in **paragraphs 133-134** of our [consultation document](#).

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?

Answer:

We believe the LSB is well placed to convene and coordinate, and we would encourage it to make active use of that position by collaborating with organisations that already have established expertise, evidence, and infrastructure in this space.

We would particularly encourage the LSB to engage with the Social Mobility Alliance, a new coalition of social mobility-focussed organisations. The alliance was created to help members work collaboratively to advance socio-economic equality across sectors, and includes leading organisations like the Sutton Trust, the Social Mobility Foundation, the Bridge Group and upReach.

The Alliance represents a ready-made forum of expertise that the LSB could draw on without needing to build new relationships from scratch. This is especially important on the issue of socio-economic background, which presents unique challenges; unlike protected characteristics under the Equality Act, it carries less legal protection, can be perceived as harder to measure consistently, and as a result often receives less regulatory focus than other diversity characteristics. Engaging with the Alliance would help the LSB navigate these challenges and develop a more rounded approach that recognises the complex and multifaceted nature of socio-economic inequality.

We would also note that while we welcome the consultation's proposal (paragraph 53) that regulators collect socio-economic background data as a minimum requirement, a further step that the LSB could take would be publishing aggregated, cross-sector analysis of that data. Individual regulators collecting data in silos will not reveal the wider picture across the entire legal industry. We would encourage the LSB to synthesise and publish this data at a sector level, so that progress can be tracked consistently over time and assessed openly across the sector.

We would also note that some of the most effective diversity work happens long before someone enters the profession, for example through outreach programmes that encourage students from lower socio-economic backgrounds to consider law as a career, and through employer programmes that help those students access work experience and training opportunities. The LSB could play a valuable role in bridging this gap by using its profile and convening power to signal to universities and law firm employers that this kind of early intervention is integral to a diverse legal industry, and by facilitating closer working between regulators and the organisations already delivering that work on the ground.

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.

Answer:

We would strongly encourage the LSB to commit to regular, public diversity data publication. For example, an annual diversity dashboard aggregating data from across legal sector regulators. To be genuinely useful, this should:

- Include socioeconomic background as a core metric alongside protected characteristics under the Equality Act. Law remains one of the most socio-economically stratified professions in the UK. SRA data revealed that the proportion of lawyers from lower socio-economic backgrounds has actually fallen from 21% in 2015 to 18% in 2023, suggesting the profession is moving in the wrong direction. This makes it critical that regulatory data frameworks give proper weight to socio-economic background, and consider how it intersects with other characteristics that can compound disadvantage.

- Track pipeline and progression in addition to access to the sector.

- Be publicly accessible, so that civil society organisations, employers, universities, and the public can engage with the data and help hold the legal industry to account.

Transparent, consistent data publication would complement the statement of policy by establishing even greater accountability.

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

Answer:

We welcome the weight the consultation gives to socio-economic background throughout its proposals. In particular the commitment in paragraph 53 to require regulators to collect socio-economic background data as a minimum, and the references to the Social Mobility Commission's guidance on doing so effectively. This is an important step and we would encourage the LSB to maintain this emphasis as the proposals are finalised, resisting any pressure to treat socio-economic background as a secondary consideration relative to protected characteristics under the Equality Act. Unlike those characteristics, socio-economic background carries less legal protection and can be perceived as harder to measure, which means it is at greater risk of being deprioritised in implementation.

The LSB's continued leadership on this issue will be vital in ensuring that does not happen. We would be very happy to share upReach's evidence and experience in this area, and to explore how we might work in partnership with the LSB and the wider Social Mobility Alliance to support its goals.