

Survey Response Document

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

Confirmed

#00000116

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:

The InterLaw Diversity Forum works to foster inclusion for all diverse and socially mobile talent working in the legal sector, to promote meritocracy, and to create environments where the best talent can succeed. Since its founding in 2008, the InterLaw Diversity Forum has grown into an organisation bringing together almost 10,000 individuals representing over 300 law firms and chambers, and over 500 corporates and financial institutions. The work and output of the InterLaw Diversity Forum has helped to drive meaningful change across the UK legal sector for almost two decades. Since its founding in 2008 the InterLaw Diversity Forum has expanded its scope beyond LGBTQ+ to encompass all strands of diversity and inclusion monitored by the SRA: including Race & Ethnicity, Disability, Gender, and social mobility; with a particular focus on leadership, cultural change in the workplace, allyship, and 'multiple identities'/intersectionality.

Our activity includes:

- An active programme of events, providing a forum to explore some of the most pressing diversity, talent, and culture challenges in the legal sector. We held 36 events during 2025, featuring over 120 speakers and attracting almost 2,500 attendees.
- A range of legal sector communities, including the Legal Leadership Culture Forum, for law firm Managing Partners and in-house leaders and the Legal Inclusion Rising Talent Network, providing learning opportunities to junior to mid-level inclusion practitioners in the legal profession.
- Research and best practice resources and toolkits, including our Career Progression in the Legal Sector research (supported by the SRA), Best Practice Guide to Diversity Monitoring, and our Inclusive Hiring Toolkit.
- The UK Model Diversity Survey ("UK MDS"), a programme created in collaboration with the ABA, which corporate and financial institutions use to monitor their legal service suppliers on talent and culture, as well as to highlight progress and share best/next practice. The UK Model Diversity Survey programme collects data from 30 major firms, charting hiring, progression and retention trends across a data set of over 20,000 lawyers.

For an overview of the work of the InterLaw Diversity Forum in 2025, see here: https://5aa06e50-1b3c-4843-b70a-a841ab933579.usrfiles.com/ugd/5aa06e_b425c03139cc417dbc689890128fa005.pdf

The InterLaw Diversity Forum recognises the significant role regulators play in setting expectations and driving accountability in relation to workplace culture. We welcome this consultation and we believe that the proposed outcomes set out by the Legal Services Board will take efforts to address barriers to encouraging a diverse and inclusive legal profession to the next level. In particular, the outcomes will reinforce the legal profession's commitment to diversity at a point where support for diversity can no longer be taken for granted. The legal profession has an opportunity to set the tone by renewing and doubling down on its commitment to removing barriers faced by diverse and socially mobile talent, and recognising that inclusion is a business imperative. As such, we anticipate that the impact of the outcomes, once implemented, will be felt beyond the legal sector.

We share comments relating to each outcome in response to Q2 -5 in this survey. When considering our response to certain questions, we referred to the eight barriers set out in the Legal Services Board's consultation document, listed below.

Barriers to encouraging diversity in the legal profession as identified by the Legal Services Board

1. Blocked routes into the profession: high costs, competitive unpaid or connection driven work experience, and cultural assumptions about the 'typical' legal professional deter people from low-income and 'non-traditional' backgrounds;
2. Biased recruitment and progression practices: early hiring and promotion processes disadvantage candidates from lower socio-economic and minoritised ethnic backgrounds due to biased decision-making, flawed processes, and third-party recruiter influence;
3. Unequal work allocation and pay: uneven distribution of high-value work drives pay and progression gaps, with women and minoritised ethnic legal professionals earning substantially less and holding fewer senior roles;
4. Carers face barriers and stigma: unpredictable caring demands clash with rigid schedules and billable targets. Flexible or part-time work is stigmatised, support is limited, and carers often use annual leave for care needs;
5. Misconduct and non-inclusive practices: widespread non-inclusive behaviours, biased assumptions, and a culture that tolerates bullying and harassment block inclusion and deter entry, return to work, and advancement;
6. Barriers for disabled and neurodivergent professionals: structural, cultural, and procedural shortcomings limit access, participation, progression, and retention for disabled and neurodivergent legal professionals; with many reporting ill treatment because of their disability and/or neurodivergence;
7. Technology risks amplifying bias: AI and other tools can reproduce or increase existing inequalities when trained on biased data or built by teams with unconscious biases; adoption gaps also exist across sexes; and
8. Poor mental health and unsustainable work culture: long hours, billable pressures, and client demands drive widespread poor wellbeing, especially for women, younger and junior legal professionals, carers, disabled, and neurodivergent people, harming retention and firm performance.

We are alive to the impacts of each of the eight barriers identified above. However, we also wanted to acknowledge that a number of regulated firms have taken proactive steps to address some of these barriers. In some instances, these interventions have had a tangible impact in addressing diversity and social mobility shortfalls in the legal profession. The InterLaw Diversity Forum's UK Model Diversity Survey programme collects data from 30 major firms, charting hiring, progression and retention trends across a data set of over 20,000 lawyers. Data collected and analysed through the UK Model Diversity Survey demonstrate that, in certain areas, we are seeing sustained progress. We believe that data-informed approaches, introduced with diligence and the required level of expertise, are having a sustained impact in improving outcomes for diverse and socially mobile talent.

Where progress is not acknowledged (alongside the challenges that remain) we may run the risk of building a perception that the legal profession is failing on all levels when it comes to addressing inequities and supporting diverse and socially mobile talent which may inadvertently deter diverse and socially mobile early talent from considering the legal profession.

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

Answer:

Yes

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:

Yes

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:

Yes

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:

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

The InterLaw Diversity Forum supports a data-informed approach to diversity, inclusion, and culture, drawing on both qualitative and quantitative insights, in order to:

- Identify barriers impacting entry to the profession, or fair access to opportunities for diverse and socially mobile talent;
- Ensure that interventions and resources are invested where they are most needed;
- Measure progress against such work.

We agree that the proposed expectations will help regulators to pursue Outcome 1.

CORE EXPECTATIONS, OUTCOME 1

Core expectation I. under Proposed Outcome 1. states that regulators must have effective, high-quality data monitoring processes in place to support a clear and thorough understanding of the diversity profile of the regulated community over time and where greater diversity needs to be encouraged.

Core expectation II. under Proposed Outcome 1. states that regulators must take additional appropriate and proportionate steps, beyond those in place to meet 29.I to identify barriers and opportunities to encouraging diversity in the regulated community, e.g., by undertaking research and/or further quantitative and qualitative data collection and targeted engagement with the profession and other relevant groups.

We felt that a slight shift in the wording of these core expectations may provide a more realistic description of the purpose of these two core expectations, as well as some modifications to ensure the focus is also on social mobility alongside diversity. (Suggested adaptations below).

I. Have effective, high-quality data monitoring processes in place to build a stronger understanding of the diversity and social mobility profile of the regulated community over time and where greater diversity needs to be encouraged. The collection and publication of diversity and social mobility data should be undertaken at an appropriate frequency determined by each regulator;

II. Take additional appropriate and proportionate steps, beyond those in place to meet to 29.I to deepen understanding of the diversity and social mobility profile of the regulated community, and to identify barriers and opportunities to encouraging diversity and social mobility in the regulated community, e.g., by undertaking research and/or further quantitative and qualitative data collection and targeted engagement with the profession and other relevant groups.

One additional consideration for expectation I, is the long-term nature of the aspiration for regulators to ensure the legal profession "Diversity that truly reflects the public, at all levels of the

profession". The LSB's Statement of policy desired results highlights this as a longer term goal, with a 7-10 year indicative timeframe. We anticipate that truly achieving this goal would require a significant overhaul of the systems supporting the current entry level talent pipeline feeding apprenticeship, trainee and broader entry level routes into the profession. This may include a requirement for employers to overhaul entry requirements. We anticipate that this would also require a significant investment of resource in earlier years awareness and engagement, in addition to more considerable steps to remove financial barriers to the legal profession for those from low income households.

The InterLaw Diversity Forum's UK Model Diversity Survey programme collects diversity data spanning headcount, hiring, promotion, departures, partner compensation and governance, in addition to data on firm policies and diversity declaration rates. This programme may provide regulators with a resource-friendly means of meeting core expectation II.

We feel the value of expectation II cannot be underestimated. Through our early work in collecting, analysing and reporting data relating to over 20,000 solicitors over a five-year period (2020-2024), we have identified themes, trends and concerns, which provide a more nuanced picture of the strengths and opportunities at a macro level. These findings will be summarised in a forthcoming report later in 2026 from the InterLaw Diversity Forum on these five year trends and insights from the UK MDS.

Under the core expectations for Outcome 1, it was a little unclear whether the LSB's intention was for regulators to prioritise working together to harmonise data collection (which we interpret as encouragement for each regulated branch to collect data against the same diversity and social mobility strands, using the same response options), or whether the LSB intended to encourage regulators to tailor their approach to data collection based on diversity characteristics relevant to the context of their specific regulatory community. We would recommend the former for a more unified approach to data in this space.

ENHANCED EXPECTATIONS, OUTCOME 1

The enhanced expectations set out under Outcome 1 include a suggestion that regulators include the following within strategic action plans:

- stretching and outcomes-based numerical targets for activities (30.II. b.)

The InterLaw Diversity Forum's Best Practice Guide to People Data Collection includes high level considerations for organisations in setting numerical targets. Here, we make clear that careful analysis of relevant context, such pipeline factors, must be considered carefully and diligently as part of any target setting process. As an RAF internal inquiry found in 2023, there is a risk that stretching, outcomes-based, numerical targets can be misinterpreted as quotas and drive the wrong behaviours (in the RAF's case, leading to unlawful positive discrimination). As such, we recommend that any recommendation to introduce numerical targets as part of the enhanced expectations makes clear that such targets must be aspirational in nature, and that clear guidance is provided to regulators around the steps they should follow when setting and communicating numerical targets.

As an additional enhanced expectation, regulators may want to consider a requirement that all diversity and inclusion related settlements (including bullying, harassment, and discrimination claims) by regulated firms be reported to the regulator. This would allow regulators to identify and investigate regulated firms that may have disproportionate numbers when compared to their peers and to identify particular individuals who may have disproportionate numbers when compared to their peers. NB: For data privacy concerns, the individuals may be coded such as “Associate 1” and “Partner 1”.

FURTHER POSSIBLE EXPECTATION, OUTCOME 1

The FCA's Diversity and inclusion in the financial sector – working together to drive change consultation (point 5.64) included a proposal that firms report to the FCA annually on measures of inclusion, with data reported on a 5-point scale of strongly agree to strongly disagree, including a neutral option.

The measures proposed by the FCA were whether employees feel:

- safe to speak up if they observe inappropriate behaviour or misconduct;
- safe to express disagreement with or challenge the dominant opinion or decision without fear of negative consequences;
- their contributions are valued and meaningfully considered;
- they are subject to treatment (for example actions or remarks) that had made them feel insulted or badly treated because of their personal characteristics;
- safe to make an honest mistake; and
- that their manager cultivates an inclusive environment at work.

The InterLaw Diversity Forum recognises that this approach holds potential to build a stronger understanding of inclusion strengths and shortfalls across regulated branches of the legal profession. Requiring regulated firms to report response metrics to their regulator may also serve to increase accountability around inclusion and workplace culture.

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:

No

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:

Yes

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 agree the proposed expectations will help regulators to pursue Outcome 2.

We recommend that, in addition to the steps set out in 31.III to support fair disciplinary and enforcement processes, regulators require disciplinary panel members to consider relevant relational or cultural factors (such as power imbalances or low psychological safety), where it is deemed appropriate to do so.

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

Answer:

No

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:

Yes

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:

Partially

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:

No

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:

Outcome 3 states that regulators support fair, flexible, and accessible pathways into, within and back into the professions that encourage a diverse profession.

Among the barriers to a diverse legal profession set out by the LSB as part of this consultation are:

- Blocked routes into the profession: high costs, competitive unpaid or connection driven work experience, and cultural assumptions about the 'typical' legal professional deter people from low-income and 'non-traditional' backgrounds; and
- Biased recruitment and progression practices: early hiring and promotion processes disadvantage candidates from lower socio-economic and minoritised ethnic backgrounds due to biased decision-making, flawed processes, and third-party recruiter influence.

Considering these barriers, we feel that the proposed expectations will partially help regulators to pursue Outcome 3.

FURTHER POSSIBLE EXPECTATIONS, OUTCOME 3

Considering the barriers above, the following additional core expectations might further support regulators to pursue Outcome 3.

- Require authorised firms to take steps to provide fair access to work experience, e.g., through phasing out the practice of providing unpaid work experience, phasing out the practice of providing unpaid work experience to connections or contacts, or through publishing pay and benefits offered through any work experience placements in order to support informed choices among those from low-income households.
- Require authorised firms to publish their policy on qualifying examination resits (particularly in relation to firms who have a policy of reneging offers of employment in response to failed qualifying exams).
- Require authorised firms to audit both: (a) their new hire and lateral policies, procedures, and outcomes and (b) promotion, pay, and reward policies, procedures, and outcomes; to ensure they remove any potential biased decision-making, flawed processes, and third-party recruiter influence. NB: this audit would be best conducted by a third-party, independent auditor/expert.

The following additional enhanced expectations might further support regulators to pursue Outcome 3

- [For authorised firms above a specified size threshold] require firms to report on the diversity and social mobility of their entry level applicant pool vs the diversity and social mobility of hires.
- [For authorised firms above a specified size threshold and for relevant branches of the profession], require firms to report on the diversity and social mobility of qualifiers (e.g., those retained on qualification within solicitors firms), vs the diversity and social mobility of the relevant cohort.

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:

Yes

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:

Yes, in the most part.

CORE EXPECTATIONS, OUTCOME 4

Core expectation VII. Under Outcome 4. states that regulators must "Where applicable, set a requirement for authorised firms to have a clear understanding of the diversity profile of their workforce (at all career stages), to have a thorough understanding of wellbeing and conduct challenges, and to take remedial action to address any evidenced disparities, reporting data and plans on these to the regulator on request."

We believe that aspects of this expectation may be more challenging for smaller firms (based both on resources and expertise available within smaller firms, and the data protection limitations smaller organisations may encounter in building a clear understanding of diversity and social mobility demographics by career stage). As such, we recommend that a size threshold is incorporated into this core expectation.

ENHANCED EXPECTATIONS, OUTCOME 4

Enhanced expectation I. Under Outcome 4 states that regulators should also consider "Where applicable, encouraging and supporting authorised firms, to encourage diversity in leadership, as well as the practice of inclusive leadership." This enhanced expectation goes on to say: "This could include, for example:

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

We recommend an additional suggestion of encouraging authorised firms to:

- e) Take steps to understand and address any systemic barriers preventing leadership consideration for diverse and socially mobile talent.

Enhanced expectation II. Under Outcome 4 highlights the appropriate use of positive action as a possible component of evidence-informed, strategic plans to encourage fair, diverse, healthy, and inclusive environments in the workplace and in professional settings.

We recommend that it is made clear that any use of positive action must be implemented with great care and appropriate legal advice in place.

We encourage consideration of alternative or additional suggestions under enhanced expectation II. Under Outcome 4, such as:

- a) Provide training to supervisors and line managers, incorporating a focus on supervising work; providing constructive / developmental feedback; supporting employee wellbeing; managing diverse teams; handling conflict within teams; promoting psychological safety; plus relevant legislative and regulatory requirements in relation to equality and workplace culture.
- b) Provide training to recruiters and hiring managers on inclusive hiring practices and steps to spot and tackle bias.

c) Develop policy relating to the fair allocation of work and fair access to career enhancing opportunities.

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:

No – although, as highlighted, certain core expectations under Outcome 4 may be less appropriate or more challenging for small firms to implement.

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:

We do not disagree with the proposed timelines, but we acknowledge that regulators may be better placed to respond to this question.

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

Answer:

N/A

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 feel that guidance and definitions will be helpful both for regulators, regulated firms and wider stakeholders in the legal profession.

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:

No

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:

N/A

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 are alive to the impacts of a changing climate around diversity, particularly on firms with a strong presence or client base in the United States. The InterLaw Diversity Forum's extensive engagement with firms and individuals within the UK legal sector has highlighted that the perceived level of risk around diversity programmes is evolving. However, we believe that this should be balanced by UK regulators reminding those whom they have oversight of in the United Kingdom are still bound to meet their obligations within the jurisdiction. This may require a tailored approach to diversity, inclusion, and culture in the United Kingdom rather than a unified global approach.

Given the complexity of this topic, we believe that it is appropriate for regulators to specify that regulated firms draw on specialist expertise (internally or externally) in response to core and enhanced expectations. Executed with care and diligence, efforts to promote inclusion and address barriers faced by diverse and socially mobile talent can have a transformative impact. Executed without the required knowledge and expertise, such efforts can hinder or undermine progress, or in some cases even create more harm than good.

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

Answer:

Point 8 of the LSB's public consultation document characterises the slow pace of change as a failing within the legal profession. Given the current makeup of the senior ranks of the legal profession, change (in relation to diverse and socially mobile representation at senior levels in the legal sector) will often be incremental.

The InterLaw Diversity Forum's UK Model Diversity Survey programme collects data from 30 major firms, charting hiring, progression and retention trends across a data set of over 20,000 lawyers. In support of the point made above, during the five years that we have collected data (2020-2024), we have observed that in certain areas, the dial is shifting – incrementally – but steadily. During the five year period, we have seen a sure and steady uptick in the percentage of women Equity Partners (+5%) and women Non-Equity Partners (+7%) across participating firms. This shift has been driven in particular through the retention of senior women, and through promotion (where the gender balance among promotion classes closely resembles the gender balance within the relevant pool). While a 1% annual increase in the percentage of women Equity Partners may seem negligible, the sustained nature of this shift is leading to a clear shift change.

We feel it is important that the outcomes acknowledge and emphasise that it is essential that change is achieved in a way that is fair to all. In certain contexts (for instance, Partnership composition in large firms) change, achieved through fair means, may be incremental in nature, but this does not automatically signal a failing or the absence of progress. What matters is that this change is sustained. We have observed that when diversity efforts are implemented in a way that is diligent and credible, rather than hurried or reaction-oriented, the impacts are more likely to stand the test of time.

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:

Covered through our earlier responses.

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:

No

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

Answer:

No