

# Final Equality Impact Assessment: Our Proposals for Regulatory Arrangements for CILEX Members

## 1. Introduction

As our final Regulatory Impact Assessment (RIA) sets out, we broadly expect that our proposals would have potentially neutral or positive impacts on professionals, regulated entities, consumers, and the public. The regulatory objectives of the current regulator of the CILEX membership (CRL) are the same as our own. In the main, therefore, there would be a transfer of regulatory functions for CILEX members to us. These would be integrated into our own functions and related processes with limited changes.

This final Equality Impact Assessment (EIA) evaluates any changes and impacts identified in the RIA, under different regulatory themes, from an equality and diversity perspective. It considers impacts in relation to the stakeholder groups included in the RIA, but specifically focusing on potential differential impacts on people within those groups.

The groups we considered within our equality impact assessments included:

- a) Consumers of legal services.
- b) CILEX members:
  - o CILEX authorised members, including those with differing practising rights (see below for CILEX's revised titles for this group\*). This includes:
    - Chartered Legal Executives, all of whom are authorised to administer oaths
    - CILEX members who have authorised additional practising rights in one or more areas of law – these include CILEX Conveyancing Practitioners, CILEX Probate Practitioners, CILEX Immigration Practitioners, and CILEX Practitioners with Litigation rights in civil, criminal and/or family law
    - CILEX-ACCA Probate Practitioners
    - Crown Prosecution Service (CPS) Associate Prosecutors
  - o CILEX non-authorised members, including:
    - Chartered Paralegals
    - CILEX Paralegals and
    - CILEX students.
  - o CILEX members working inside SRA regulated firms (authorised and non-authorised members)
  - o CILEX members working outside SRA regulated firms (authorised and non-authorised members).
  - o CILEX entities (authorised)
  - o CILEX-ACCA Probate entities.
- c) Solicitors
- d) SRA regulated firms (which can include solicitors, CILEX members and other employees who are neither solicitors nor CILEX members).
- e) Other stakeholders, including the wider public.

Our RIA addressed points made by stakeholders from the solicitors' profession about potential impacts on that profession. Following considerations as part of the RIA, however, we expect solicitors to experience neutral impacts from our proposals. This EIA, therefore, mainly focuses on CILEX members, clients of legal services and wider consumers and the public.

## **2. Regulatory Themes and Evidence**

We have grouped our assessment of impacts under the same themes that are found across our consultation documents and the final RIA, for ease of reference.

A short explanation of changes relating to our proposals is set out under each theme. Further details of these are provided in the associated, final RIA.

Our assessments for the purposes of our consultations drew on:

- Comparisons between existing regulatory arrangements for CILEX members and SRA regulated individuals and firms.
- Relevant data and research findings available from the SRA, CRL and other legal services regulators, which we could access.
- Comments from those who responded to the consultation and engagement we delivered (see our consultation response documents for further information).
- Relevant research findings on equality and diversity from government and academia.

We had limited access to data broken down by specific types of CILEX members and their personal characteristics, or clients of their legal services, to inform the impact assessments under each theme. We also received very limited feedback from stakeholders on equality and diversity issues, although we included specific questions on whether respondents had comments on our draft equality impact assessments as part of our consultations.

We, therefore, acknowledge that this EIA is limited by these data constraints, although it should also be noted that our RIA identified neutral or positive impacts from our proposals.

We will ensure evaluations of the consequential changes to our regulatory arrangements. The design of such evaluations will give consideration to data limitations specifically identified in this EIA and how these might be addressed. The evaluations will gather and analyse evidence of the actual impact of our arrangements on affected stakeholders including consumers, CILEX members and solicitors. We will publish the outcome of our evaluations, and report on any changes we have made to our work as a result of the findings. Where any impacts identified interacted with equality and diversity, we would give further consideration to whether these called for new mitigating actions.

### **2.1 Governance**

#### **Summary of Changes**

We would put governance arrangements in place with CILEX.

#### **Impact Assessment**

We did not identify any specific impacts in our RIA which related to this theme, and we have not identified any specific equality impacts. CRL and the SRA are both subject to the

regulatory objective in the Legal Services Act to encourage an independent, strong, diverse, and effective legal profession. Both bodies have incorporated equality and diversity considerations in their Codes of Conduct for those they regulate. Both work within the LSB's framework to encourage and promote a diverse legal services sector, which includes data collection and publication requirements, diversity outcomes and criteria for good regulatory performance on equality matters.

**Conclusion:** We are expecting neutral impacts for this theme.

## 2.2 The Prior Conduct Tests

### Summary of Changes

The replacement of the CRL Prior Conduct test by the SRA's Character and Suitability test would introduce a limited change to existing CRL prior conduct processes by requiring the declaration of health conditions that could potentially impact on a person's capacity to practice at the point of application for CILEX membership. This would be unless the individual was already appropriately addressing any conditions that could present risks to consumers. We would also not replicate the CRL approach of having health issues considered by a special committee. Overall, our approach to health issues focuses on identifying and addressing any risks to consumers.

### Impact Assessment

#### The Professions

There is the potential for the above change to interact with equality characteristics and social economic status. The Equality Act 2010 recognises that someone is disabled if they have a "physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to do normal daily activities". This definition can interact with health conditions.

We also recognise that potential impacts could be intersectional and affect various groups. Reports published by the Kings Fund ([2022](#)) and [Public Health Wales \(2022\)](#) highlight that health inequalities in England and Wales can interact with socio-economic factors, geography, specific personal characteristics such as sex, ethnicity and disability, and social exclusion. Recent findings on data on prior conduct cases included in a [CILEX regulation report](#) (2022) on enforcement found a possible overrepresentation of males, those identifying as Black and disabled people compared to the wider composition of the CILEX membership.

Under the CRL's Health Committee rules information received about a relevant person or applicant that raises questions of their fitness to practise on the grounds of health can lead to them being required to disclose medical reports relating to fitness to practise, at any time. The changes we are proposing are, therefore, limited.

Our recent [impact assessments](#) on changes to our health and well-being rules concluded that these should reduce delay, uncertainty and stress that can be generated for everyone involved where a health concern affects the progress of a case. We felt that our rules would encourage those whose health issues may affect their fitness to practise, including those with a disability, to be proactive in managing any issues.

We have [guidance](#) in place that supports understanding of our approach to health-related issues. We would also work with CILEX to ensure that information on CILEX membership clarifies that declaring a health condition through our Character and Suitability test is for the

consumers' benefit and we would only focus on those conditions that could impact on fitness to practice. In addition, we recognise that in many cases, health conditions can be managed, and reasonable adjustments arranged. We only become involved where there is evidence of a potential risk to the public and will only act as far as required to protect clients and the public. We do not, for example, require regulated individuals to tell us about a health condition where they are satisfied that they are taking appropriate steps to mitigate any regulatory risks it poses.

### Consumers and the Public

Our proposals could increase protections for consumers, including those with protected characteristics and/or who have vulnerabilities by ensuring those that provide legal services are fit to do so. We also expect limited impacts on professionals from the changes being made (see above) and therefore limited impacts on the diversity of services available to consumers.

**Conclusion:** Whilst we recognise that certain groups of CILEX members may be impacted differently, our guidance and flexible approach should ensure that any impact is appropriately targeted. Our approach to health issues is proportionate given the need to protect the public and could increase protections for consumers.

## **2.4 The CILEX Code of Conduct**

### **Summary of Changes**

The Core Principles in the existing CILEX Code of Conduct are already closely aligned with the SRA Principles and Codes for solicitors and firms. We proposed to maintain these for CILEX members with minimal drafting amendments.

### **Impact Assessment**

Following analysis of the available evidence, no specific equality issues have been raised in relation to this theme.

**Conclusion:** No impacts for the professions or consumers and the public are expected in relation to this theme.

## **2.5 CILEX Entities and CILEX-ACCA Probate Entities**

### **Summary of Changes**

There would be some differences in arrangements for CILEX entities. We propose to passport six of these over as SRA-regulated firms as they are already eligible for authorisation as such. The remaining firms would need to remain under transitional arrangements with CILEX pending any changes to legislation to allow them to come within the SRA Compensation Fund.

SRA regulated firms would come under our current Code of Conduct for firms. Our Code of Conduct is similar to the Code of Conduct and regulatory requirements that CILEX entities currently adhere to. There, however, are some differences, including in relation to (1) transparency, (2) PII, (3) accounts and (4) financial services rules.

We would maintain the current regulatory arrangements for CILEX-ACCA Probate practitioners and entities and would accordingly make consequential changes to the rules currently set out in the CILEX-ACCA Probate Handbook.

### **Impact Assessment**

See sections that specifically relate to the regulation of CILEX entities on funding regulation, client protection, client information and other regulatory issues below. Generally, we are expecting neutral or positive impacts from our proposals in relation to these themes.

We are expecting to make minimal changes to the CILEX-ACCA Probate Handbook and have not identified any specific equality issues arising from this.

Conclusion: We have not identified any particular equalities impacts under this theme.

## **2.6 Individual Authorisation, Education and Qualifying Experience**

### **Summary of Changes**

Our proposals set out how we will continue to maintain a clear separate route to becoming a legal professional for CILEX members in accordance with the provisions of the CILEX Charter.

The RIA associated with this EIA also sets out how we propose some relatively small changes to current qualifying experience arrangements for CILEX members.

### **Impact Assessment**

- Education

Some stakeholders responding to our consultations emphasised the need to retain diverse routes to qualification for CILEX members. In response to our consultation on arrangements for authorised members, an education provider (the Bloomsbury Institute) approved by CRL, also evidenced the diverse populations accessing current CRL approved courses, including their LLB (Hons) Law and Practice Programme. They pointed to evidence to support that continuing to recognise alternative routes to qualification enabled improved equality outcomes. For example, in 2023 circa 69% of students studying their LLB (Hons) Law and Legal Practice are Black, Asian or a minority ethnic origin and 29% had declared a disability. As part of this EIA, we also considered data on CILEX routes to qualification and their interaction with protected characteristics. This evidenced that diverse routes to qualification may support people from minority groups in different ways. An emerging theme from CRL's [diversity report](#) (2023) was the apparent ambition of Black, Asian and minority ethnic individuals to progress through CILEX membership to qualify as solicitors. Similarly, recent data included in the report suggested that Black, Asian, and ethnic minority members who were Chartered Legal Executives (CLE) were not progressing their careers in the same way as CLEs identifying as White members. It also suggested that Black, Asian and minority ethnic members identifying as solicitors had progressed further. CRL data suggested that Asian members might be able to progress more successfully as Chartered Legal Executives and that Black individuals might have used the CILEX qualification as a progression pathway to solicitor.

We do not believe our proposals would have negative impacts on either these diverse pathways to qualifications or the benefits these provide to diverse groups. Such an approach aligns with our regulatory intentions. We would continue to recognise the separate CILEX

route to authorisation as supporting diversity and consumer recognition of the differences between the practice rights of the two professions.

Within our consultation on authorised CILEX members we also stated that we would include the interface between solicitor training and qualifying experience for authorisation as an authorised CILEX lawyer as part of our future consideration of the education requirements for authorised CILEX members. This could include understanding how this interacts with equality characteristics and how we could further encourage equality and diversity. There would, for example, be the opportunity to provide aspiring legal professionals with information on all routes (pathways for both solicitors and CILEX members) through a single regulator. In the event of redelegation, we could also consider integrating consideration of diverse CILEX members into our work on identifying and tackling differential outcomes in professional legal assessments. For example, we recently we [published research](#) to understand why minority ethnic students are more likely to have poorer outcomes than White candidates in legal professional assessments.

We recognise the role CILEX holds in developing and delivering educational awards which lead to authorisation as a Chartered Legal Executive and the obtaining of specialist practice rights. We said that we would work with CILEX over time to consider any case for amending these arrangements, including with reference to supporting equality and diversity. We recognise that the education routes for solicitors and authorised CILEX members are very different and will remain so.

- Qualifying Experience

We have not been able to access specific data on the personal characteristics of those who would be immediately and directly impacted by the changes we are proposing to arrangements for qualifying experience. This would be the specific cohort working towards authorisation when the changes were made and where sign-off by an authorised person was not possible.

The RIA provides explanations why we are proposing to make several changes to qualifying experience processes for CILEX members. We are not expecting our changes to have major impacts on CILEX members but have recognised that our proposed changes for sign-off of qualifying experience could have impacts on those already working towards authorisation. We have also set out that we will make transitional arrangements if necessary to ensure that people currently working towards authorisation as an authorised CILEX lawyer are not unfairly disadvantaged by our proposed removal of the discretion (included in CRL's rules) to allow sign-off of qualifying experience by anyone who supervises or employs a candidate. For the future, our waiver rules provide us with an avenue to consider any case where sign-off by an authorised person is not possible and there is an acceptable alternative way of signing off qualifying experience.

**Conclusion:** Whilst we acknowledge the limitations on our data, based on what is available we are expecting limited impacts from our proposals, and where possible positive impacts are identified (above) we would seek to build on these.

## 2.7 Continuing Competence

### Summary of Changes

We have proposed to apply the same approach to oversight of continuing competence for a CILEX members as we currently apply to solicitors. We would not therefore routinely check CPD records as CRL does.

We recognise that if CILEX routinely checks CPD as part of its membership function, it would share with us any information from these checks that may raise regulatory issues. This would be particularly around the requirements in the SRA CILEX Principles and Code of Conduct to maintain competence and keep professional knowledge and skills up to date. We would consider such information in accordance with proposed regulatory processes including whether enforcement action was required.

### **Impact Assessment**

Both solicitors and CILEX members would be expected to maintain an updated understanding of how to treat everyone fairly as this is set out in their Codes of Conduct.

We have, however, not been able to access specific, recent data on how equality and diversity characteristics interact with the CILEX CPD checks.

**Conclusion:** We are expecting mainly neutral impacts from our proposals, but we also recognise the data constraints. We would, therefore, give further consideration to how best address such data limitations in our evaluations of the consequential changes to our regulatory arrangements.

## **2.8 Registers**

### **Summary of Changes**

The register for CILEX authorised members would include details of any regulatory action that we have taken in relation to authorised CILEX members, such as placing conditions on a practising certificate or disciplinary action.

Disciplinary findings against non-authorised CILEX members would be recorded with our other findings against non-authorised persons under our jurisdiction (such as former employees of SRA regulated firms subject to orders under s43 of the Solicitors Act 1974 preventing them from being employed by solicitors in the future).

CILEX entities reauthorised as SRA firms or authorised CILEX bodies will be listed as such on our Solicitors Register. Where relevant this will show the scope of firms' authorisation in line with the practising rights of the authorised CILEX members who own and manage them.

We would also take on ownership and publication of the separate register of CILEX-ACCA Probate entities currently published by CRL.

We would liaise with the CPS on future arrangements for publishing information about CPS Associate Prosecutors.

### **Impact Assessment**

#### The Professions



There could be interaction between disciplinary information and overrepresentation of particular groups in enforcement cases. It should, however, be noted that CRL also maintain a public [directory](#) containing details of all CILEX (or previously ILEX) members, CILEX Practitioners and Authorised Entities who have had a disciplinary decision made against them. Our proposals are merely about how those records are housed, so any impacts are, therefore, likely to be very limited. Our general approach to equality and diversity issues in investigation and enforcement are set out in a following section.

### Consumers and the Public

As we would continue to make relevant information available, we would not expect any significant impact from our changes.

**Conclusion:** we do not expect the changes we are proposing to the register will have any significant impact on equalities.

## 2.9 Investigation and Enforcement

### Summary of Changes

Following our consultations, we propose to take on CRL's disciplinary powers and apply the same process for reports about solicitors and other individuals and firms we currently regulate to all CILEX members. These processes include triage, assessment, investigation, notice and decision. Detailed differences between our proposals and current processes for CILEX members are detailed in our final RIA.

### Impact Assessment

#### The Professions

We recognise that any changes to investigation and enforcement arrangements for CILEX members could be more likely to impact on particular groups who are over-represented in enforcement cases. SRA data on enforcement is published annually, and broadly this suggests an [over-representation](#) of certain groups (including men and solicitors from Black, Asian and minority ethnic backgrounds) in concerns raised and cases we investigate. CRL [data](#) on CILEX members also suggests the possibility of over-representation (at particular stages) of those identifying as Black, Asian, and/or male and other protected characteristics, although analysis by CRL recognised that limited conclusions could be drawn due to data limitations.

In terms of specific changes:

- Our position on health issues and a separate Health Committee and possible impacts are set out in an earlier section in this EIA (see section on prior conduct tests above). We identified neutral or positive impacts in relation to this.
- The removal of the time bar (whereby a report of misconduct may be rejected by an investigator due to more than a 12-month period between the events and investigation) could interact with overrepresentation of particular groups in enforcement cases. We do not apply a time bar, as we consider this presents a barrier to taking action which might be needed in the interests of the public. We recognise that any changes to enforcement arrangements, however, could interact with the overrepresentation of particular groups in enforcement cases.
- Within our consultation, we identified some differences between our sanctions and controls (see Appendix 3 of our [consultation](#) on authorised CILEX members). The SRA, for example, recently introduced fixed penalties and these are not currently part



of CRL regulatory arrangements. We undertook an impact assessment when we [consulted](#) on changes to our financial penalties (including introducing fixed penalties) regime in 2022. We identified that positive benefits were associated with taking a robust stance on the most serious misconduct including on discrimination and harassment issues. We also stated that our proposals to introduce fixed penalties for certain types of less serious non-compliance could have positive impacts that would be felt by all groups by providing certainty and streamlining the process of investigation with the associated reduction in costs and anxiety. The CRL data suggests that those identifying as Black, Asian and/or male are more likely to be overrepresented as certain stages of CRL investigation and enforcement processes. There is, therefore, the potential for people in these groups to gain benefits from our financial penalties' regime.

- Our proposals for rights of review and appeal for all CILEX members, and intention to seek a statutory instrument giving all CILEX members the same external rights of appeal to the SDT as solicitors and SRA-regulated firms, could offer potential positive impacts to groups who are overrepresented in investigation and enforcement processes.

In the associated final RIA, we also identified how removing duplicate investigations (which would currently be undertaken by both the CRL and SRA) could reduce the length of prior conduct and misconduct cases where such duplicate investigations occur. This could have benefits for groups that are overrepresented in enforcement cases.

### Consumers and the Public

In our consultation on non-authorised CILEX members, we stated that [an independent review](#) included the finding that perhaps up to 40 per cent of police attendances are carried out by accredited representatives. Many of these are likely to be from the relevant duty solicitor's firm, for example CILEX paralegals who do not, or choose not to, meet the full LAA requirements for duty solicitors but are nonetheless qualified as accredited representatives. Black people are likely to be disproportionately represented in their client group according to Government figures. [The Legal Services Consumer Panel Tracker Survey \(2023\)](#) also found that "legal aid was more likely to have been used by Mixed Ethnicity (15%) consumers than the overall sample. Black consumers were more likely to have used legal aid (10%) and insurance (9%). By social grade, those in the C2DE grade were significantly more likely to have used legal aid (9%) than those in the ABC1 grade (4%)".

We recognise that it is important that consumers are offered a diversity of legal services that match to their needs, including in terms of costs. We also recognise that CILEX members are an important part of that diversity. We are not expecting our proposals to impact on this.

**Conclusion:** Above we have identified potential positive impacts for CILEX members. In the event of redelegation, we could give consideration of CILEX members when investigating and seeking to address overrepresentation of certain groups within enforcement cases.

We are not expecting significant equalities impacts on consumers, although where certain equalities groups are disproportionately represented (as in the duty solicitors/legal aid examples above) they could benefit from any positive impacts on CILEX members.

## **2.10 Funding the Costs of Regulation**

### **Summary of Changes**

Under existing arrangements authorised CILEX members' practice fees fund the regulatory costs of non-authorised members. We do not intend to initially change these arrangements, although we recognise fee structures can be reviewed and changed over time.

### **Impact Assessment**

We are not intending to make immediate changes in current arrangement for CILEX members funding of the costs of regulation and therefore have identified no specific equality impacts in relation to this theme, at this time. We do not expect that regulatory fees for CILEX members will increase as a result of the redelegation. We recognise that if further changes are made in the future, these would need to be assessed for impacts.

## **2.11 Client Protection**

### **Summary of Changes**

Generally, the same client protection requirements would generally apply to CILEX entities (apart from CILEX-ACCA probate entities) as for current SRA-regulated firms. CILEX-ACCA probate entities would have separate requirements in place including Professional Indemnity Insurance (PII) and fidelity guarantee insurance requirements. These entities are not allowed to hold client money and are supervised by ACCA for AML purposes.

### **Impact Assessment**

#### The Professions

In terms of the impact on CILEX firms of moving to the SRA Compensation Fund, as set out above, only six firms would be moving immediately. We have proposed an increase of firm contributions from £660 to £2220 in our draft business plan for 2024-25. If implemented there could be an increased cost to these firms from the current CILEX compensation fund rates depending on the firm's size, the categories of law they offer and whether they hold client money.

We have identified the possibility of a PII premium increase for the up to 20 CILEX firms that would come under the SRA Minimum Terms and Conditions in the future. This is dealt with in more detail in the Regulatory Impact Assessment.

We have had some access to diversity data on CILEX entities (2023). This, however, does not provide the basis to undertake a detailed assessment of the specific impacts of the proposed changes on the CILEX entities.

#### Consumers and the Public

The SRA Compensation Fund has wider coverage than the CRL equivalent. In particular, the CRL arrangements are only available in respect of those legal services that CRL has specifically authorised a firm to offer, and therefore do not cover any unreserved activities they may carry out.

The data does not suggest that any change in PII premiums for the firms concerned would lead to any sizeable increase in costs which might be passed onto consumers.

**Conclusion:** We are expecting positive or neutral benefits for consumers from the above proposals. However, we do not currently have the information to enable us to undertake a detail assessment to how our proposed changes would impact on CILEX entities that would need to make contributions to the SRA Compensation Fund and PII costs and their clients. We would therefore give further consideration to how to best address such data limitations in our evaluations of the consequential changes to our regulatory arrangements.

## 2.12 Consumer Information

### Summary of Changes

CILEX members and entities would need to follow SRA Transparency Rules, which are currently more extensive than those of CRL. Further details of these changes are provided in the RIA associated with this EIA.

### Impact Assessment

#### The Professions

As noted in the final RIA, CRL developed their Transparency Rules with reference to the areas of law covered in the Transparency Rules of other regulators. CRL did this to create a consistent approach and offer clarity to consumers using firms across the regulated legal services community. It also stated that they would extend the Transparency Rules to other areas of law, over time. This means that the changes we are proposing would provide a more consistent approach and over time CRL may have taken a similar approach.

#### Consumers and the Public

Consumers are the focus of our evaluation of outcomes from our Transparency Rules. [Year one](#) of the evaluation of our Transparency Rules (2020) included findings that for Black and Ethnic Minority and disabled consumers, “information on the nature of the legal process (e.g. timescales and key stages) and information which offers reassurance with respect to customer treatment, potential redress and service quality (such as complaints information, customer reviews, if the provider is regulated, regulator’s logo etc.)” is viewed as particularly important when selecting a legal provider. These groups could, therefore, potentially benefit from our Transparency Rules being extended to a wider range of legal areas than is the case under CRL transparency rules.

Our [year three](#) evaluation of our Transparency Rules found they were having an impact and helping consumers to compare legal services providers and make informed choices. This indicated that more consumers were using the information firms were publishing to shop around, confidence in providers was growing, and that the SRA clickable logo was helping consumers who engage with it to understand their protections.

[Scopelliti and Estes \(2023\)](#) also found that communication is paramount to overcoming consumers’ worries about affordability. They found that legal service providers who explain the legal process clearly, who are responsive to consumers’ queries, and who emphasise their legal specialisation may be most effective at encouraging legal service use. This could impact on access to justice, including for those are faced with affordability issues.

**Conclusion:** We therefore believe that the application of our Transparency Rules to all those we regulate could be to the benefit of consumers, including equality groups.

## 2.13 Communications

### Summary

Our public facing communications will reference all our regulated communities, but also distinguish between solicitors, authorised and non-authorised CILEX members.

### Impact Assessment and conclusion

We are not expecting the above to have impacts on equality groups.

## **2.14 Other Regulatory Issues**

### **Summary of Changes**

We would apply our Accounts Standards to CILEX entities and authorised individuals. As a result, we would not retain CRL's requirement for an authorised CILEX member to be authorised separately in relation to "official appointments". In addition, we would apply the same approach to Third Party Managed Accounts and allowing entities to carry on regulated financial services as for current SRA-regulated firms. We would make some changes to the handbook for CILEX ACCA-Probate Entities, although we would seek to keep these to the minimum necessary to recognise the changes in regulator.

### **Impact Assessment**

Our final RIA suggests little impact arising from the above proposals and we have no indications that there would be equality impacts.

## **3. Conclusion**

The above sets out the equality impact assessment that we have been able to undertake with the information available to us. This identifies that we are expecting neutral or positive impacts from our proposals.

As stated before, we acknowledge that impact assessment at this stage remains limited by data constraints. Any changes implemented will be evaluated. The design of such evaluations will give consideration to data limitations specifically identified in this EIA and how these might be addressed. The evaluations will gather and analyse evidence of the actual impact of our arrangements on affected stakeholders including consumers, CILEX members and solicitors. We will publish the outcome of our evaluations, and report on any changes we have made to our work as a result of the findings. Where any impacts identified interacted with equality and diversity, we would give further consideration to whether these called for new mitigating actions.