



CLC Diversity and Inclusion Statement

Foreword

We want constantly to improve our organisation as both a regulator and an employer. In order to make this a reality we need to recognise that everyone, whatever their circumstances, should be able to develop and exploit their talents. To respect this diversity, artificial obstacles should not be put in the way of the individual; and the individual should be enabled to overcome barriers to utilise their skills and experience.

We are committed to creating an environment where diversity and inclusion are an intrinsic element of our business and not an additional consideration; discrimination will not be tolerated; where there are no unnecessary barriers; and inclusion is promoted. CLC is an organisation small in number but covering the entire range of regulatory functions. Our size and structure gives us opportunities to be quick in decision making and to be innovative in finding solutions to issues. Clearly there are also constraints - but we will try our best to ensure that equal opportunities are provided irrespective of age, caring responsibilities, caste, disability, ethnicity or race, marital status, religion or belief, sex (including people who have had gender reassignment), sexual orientation or socio-economic background.

Anna Bradley

Chair

Sheila Kumar

Chief Executive

1. Diversity is about understanding and treating people as individuals i.e. recognising difference. Inclusion is about providing everyone with the same level of fairness i.e. an equal chance to contribute and participate.
2. In keeping with the Equality Act 2010, we are dedicated to creating a working and regulatory culture in which diversity is recognised and valued; equality of opportunity is promoted actively; and in which unlawful discrimination, victimisation and harassment are not tolerated.
3. In exercising our regulatory functions we will seek to ensure that no individual, or a group with a protected characteristic, is discriminated against because of that characteristic.
4. As an employer we will seek to ensure that no applicant, trainee or employee, or a group with a protected characteristic, is discriminated against in recruitment, appointment, appointment terms and conditions, promotion, training and benefits opportunities because of that characteristic.
5. Our complaints handling-process is responsive to individual needs (including those of people who are vulnerable or have disabilities).
6. Allegations of discrimination will be investigated under our grievance procedures. We will take such allegations very seriously and where an employee or stakeholder is found not to have complied with the policy we will take disciplinary action against them.
7. We will provide training to ensure staff are aware of their responsibilities under this policy. All new employees will be made aware of this policy as part of their induction.
8. The policy will be updated as legislative and regulatory requirements are revised, in light of lessons learned and in view of any good practice identified.

Please see our Diversity and Inclusion Regulatory and Employer Policies for detail on how this Statement is applied in practice.



Diversity and Inclusion – Regulatory Policy

1. Introduction

1.1 As an [Approved Regulator](#) we must at all times act in a way which is compatible with the regulatory objectives of:

- a) protecting and promoting the public interest;
- b) supporting the constitutional principle of the rule of law;
- c) improving access to justice;
- d) protecting and promoting the interests of consumers;
- e) promoting competition of services provided by Authorised Persons;
- f) encouraging an independent, strong, diverse and effective legal profession;
- g) increasing public understanding of the citizen's legal rights and duties; and
- h) promoting and maintaining adherence to the professional principles.

1.2 The [regulatory objectives](#) are deliverable only if we actively promote equality of access, service and opportunity. We must promote an inclusive culture in which diversity is recognised and valued and equality actively promoted. This policy sets out how we discharge our regulatory responsibilities in a way which is mindful of considerations of equality and diversity and which is fair and objective.

1.3 Our responsibilities are two-fold: as both a regulatory body and an employer we must work to eliminate discrimination and promote inclusion and equality of opportunity. This applies equally to all, irrespective of age, disability, ethnicity or race, gender reassignment, religion or belief, sex or sexual orientation. This policy demonstrates our commitment to the equalities agenda in our

regulatory role. Please see our 'Diversity and Inclusion - Employer Policy' for how we deliver our commitment to the equalities agenda in our role as an employer.

2. Equality in practice – as a regulatory body

What you can expect from us

- 2.1 You can expect us in our dealings with you to promote equality of access and experience. We will review our regulatory decisions and publication provisions to ensure there is no bias against age, disability, ethnicity or race, gender reassignment, religion or belief, sex or sexual orientation.

Accessibility

- 2.2 The CLC website signposts users to the 'my web, my way' facility which enables them to change the font and imaging on their computer.
- 2.3 CLC publications are available on the website and may be available in alternative formats on request - e.g. large text or a language other than English.
- 2.4 We will signpost the regulated community to the [British Standard Inclusive Service](#) through our newsletter and website.

As a qualifications provider

- 2.5 Entry criteria: we seek to make access to the qualification as wide as possible. Mature students are asked to provide only a proven track record of practical training (with no stringent requirement of prior academic attainment).
- 2.6 Qualification format: typically the Licensed Conveyancing qualification would takes 2-3 years to complete but students are permitted to take up to 10 years. This enables students to balance home, work and training needs and/or to take a break from their studies should their life require it due to factors such as maternity leave or long-term illness.
- 2.7 To allow students the choice of learning path which suits them best, courses are available in both a classroom-based format and a distance learning arrangement. Reasonable adjustments are made as judged appropriate to a student's declared circumstance.
- 2.8 We are actively exploring the routes (e.g. apprenticeships and technician options) to enable greater access to meaningful careers for people from non-traditional backgrounds or who may want, need, or wish to earn whilst they learn.

What we expect from you

Expectations of regulated community - Positive Outcomes for Clients

3.1 It is essential that legal services providers offer equality of access to potential clients and deliver equality of service to actual clients. Our [Code Of Conduct](#) requires our regulated community to deliver the following Outcomes (i.e. delivery of a positive result for clients):

- The service is accessible and responsive to the needs of individual Clients, including those who are vulnerable;
- No-one- Client, employee, colleague, job applicant, trainee or other party - you deal with feels discriminated against (whether directly or indirectly), victimised or harassed;
- You accept responsibility where the service you provide is not of the expected standard and provide appropriate redress for the Client where necessary;
- Handling of complaints takes proper account of Clients' individual needs, including those who are vulnerable;
- Complaints are dealt with impartially and comprehensively.

To enable the regulated community to deliver these Outcomes we have provided [Guidance](#) , such as example policies/procedures and an overview of the Equality Act.

Access to justice

3.2 Equality of access is essential to the interests of both the public and actual consumers. It is also in the interests of legal service providers to be responsive to the varied needs of clients. As a regulator we have the opportunity to enable the regulated community to deliver accessible and equitable services to clients. Access to justice is an important element of this. Applicants for a Licensed Body licence are required to provide us with an access to justice statement to ensure they have taken this into consideration. A thematic summary of these statements is available [here](#). By access to justice we mean offering a variety of access routes to potential clients; the statements of firms have included extended opening hours, online services, one stop shops, and transparent and affordable pricing.

Our regulatory approach

3.3 Our analysis of whether the Outcomes at 3.1 are being delivered is informed by a range of information, including that provided by the [Legal Ombudsman](#) . The Ombudsman is the independent body which deals with service complaints from Clients who are dissatisfied with how their legal services provider dealt with their initial complaint. The Legal Ombudsman forwards on to the CLC complaints of a conduct nature. Where our analysis identifies thematic complaints-handling issues we will issue guidance to help address them. We will work with

individual bodies whose complaints-handling arrangements are found to be in need of improvement.

- 3.4 Where the Outcomes are threatened or are not delivered we will act. Should this take the form of an adverse discrimination finding, whether by a civil court or employment tribunal, it may be judged to constitute a material breach of the Code of Conduct's Overriding Principle to *Promote Equality of Access and Service*. This may result in us taking formal disciplinary action. Potentially this could result in the licence of the individual/body being revoked.
- 3.5 We have published a [Client Charter](#) so those who access the services of the CLC's regulated community are aware of the service standards – including those identified at 3.1 - they can expect and what to do if these are not delivered.
- 3.6 You will be required to undertake a diversity profiling exercise of your firm from time to time. This includes age, caring responsibilities, disability, ethnicity, gender reassignment, religion, sex, sexual orientation and socio-economic status.

4. Policy Consultation, Promotion & Evaluation

- 4.1 This policy is available for reference and downloading from the CLC website. We publish summaries of the diversity profiling exercises and access to justice statements. Where this, or any other data, identifies that an access barrier may be at play we will seek to clarify whether this is the case and to take action as judged appropriate.
- 4.2 The CLC will carry out an investigation in accordance with its complaints policy into any complaint received from an individual or body about the way in which the CLC has exercised its functions in relation to that individual or body (except where an appeal/review request has been made).
- 4.3 Effective partnership working can help ensure that issues are properly identified and understood and appropriate solutions are applied. We work with the [Legal Services Board](#), [Legal Services Consumer Panel](#) , other Approved Regulators and representative bodies in delivering the regulatory objectives.
- 4.4 The Induction pack for new staff and the Staff Handbook include this policy.
- 4.5 We review our communication pathways. Internal processes are subject to moderation/review to ensure they are consistent and non-discriminatory.



Diversity and Inclusion - Employer Policy

1. Introduction

- 1.1 Our responsibilities are two-fold: as both a regulatory body and an employer we must work to eliminate discrimination and promote inclusion and equality of opportunity. This applies equally to all, irrespective of age, disability, ethnicity or race, gender reassignment, religion or belief, sex or sexual orientation. This policy demonstrates our commitment to the equalities agenda in our employer role. Please see our 'Diversity and Inclusion – Regulatory Policy' for how we deliver our commitment to the equalities agenda in our role as a regulator.

2. Equality in practice – as an employer

- 2.1 In order that they reach a wide range of potential applicants, advertisements for job vacancies can be placed in a range of online and hard copy mediums, including recruitment agencies, national and local newspapers, the Job Centre and CLC's website, depending on the nature of the particular vacancy.
- 2.2 Proposed recruitment and selection techniques, advertisements, job descriptions, and person specifications are assessed to ensure they do not discriminate.
- 2.3 The staff performance review process seeks to develop staff to help them achieve their personal aspirations.
- 2.4 Our recruitment and retention policies take account of the Equality Act 2010.
- 2.5 Recruitment, training and promotion assessments are carried out in line with clear job descriptions and person specifications to ensure that decisions are made solely on objective and job related criteria.

Diversity Profile

- 2.8 We will from time to time document the profile of our staff and Council and when we do so reports will be available on our website. This includes age, caring responsibilities, disability, ethnicity, gender reassignment, religion, sex, sexual orientation and socio-economic status.

3. Scheme Consultation, Promotion & Evaluation

- 3.1 This policy is available for reference and downloading from the CLC website. We publish summaries of the diversity profiling exercises and access to justice statements. Where this, or any other data, identifies that an access barrier may be at play we will seek to clarify whether this is the case and to take action as judged appropriate.
- 3.2 The CLC will carry out an investigation in accordance with its complaints policy into any complaint received from an individual or body about the way in which the CLC has exercised its functions in relation to that individual or body (except where an appeal/review request has been made).
- 3.3 The Induction pack for new staff and the Staff Handbook include this policy.
- 3.4 We review our communication pathways. Internal processes are subject to moderation/review to ensure they are consistent and non-discriminatory.