



## **EQUALITY CODE REVIEW**

### **Consultation Paper**

**June 2022**

#### **Consultation deadline**

This consultation will run for twelve weeks.

It will close on 30 August 2022.

## **Background**

The CLC's Equality Code has been in place for some years and in keeping with good administrative practice, a review was included in the business plan for 2021. The process has three primary aims:

1. To ensure the Code is up to date.
2. To ensure that the Code is clear in the expectations it sets out.
3. To ensure that the CLC has the tools it needs to meet its own obligations.

Following work on the above the following consultation paper set out the CLC's proposals to enhance the Code.

## **Summary**

This CLC proposes the addition of two new requirements to our Equality Code, on two items:

- data collection; and
- complaints reporting.

These proposed amendments were finalised and approved at the CLC's Council meeting in May 2020 and do not form part of the Code of Conduct at present.

If other significant issues are raised as a result of this initial consultation, the CLC will also consider whether to run a second consultation on a revised Equality Code that takes into account feedback from this process.

## **Why this consultation is important**

Practices regulated by the CLC, and their representative bodies should consider how the options set out in this consultation could affect their work, staff and clients, and the reputation of the regulated community. Clients of regulated entities and organisations representing consumers should consider whether the options set out in this consultation have any impacts on client protection. Other organisations in the property and probate sectors should consider whether the options set out in this consultation have any impact on themselves, their clients or the wider reputation of the sector,

## **Responding to this consultation**

You can respond to the consultation by email to [consultations@clc-uk.org](mailto:consultations@clc-uk.org) or by post to:

The Council for licensed Conveyancers, WeWork, 131 Finsbury Pavement, London,  
EC2A 1NT.

The CLC will publish all responses and may refer to any of them specifically in any further document it publishes following this consultation. If you wish all or part of your response to be treated as confidential, please clearly indicate that when you respond.

**Consultation deadline**

This consultation will run for twelve weeks until the end of 30 August 2022.

**Next Steps**

The Council of the CLC will consider the responses to this consultation and finalise a submission to the LSB to approve the final rule changes. That submission will be published along with consultation responses (noting the caveat about confidentiality above).

Depending on responses to the process, and whether and how any changes may be approved, the CLC will also be looking at supporting material (such as example policies / templates and advice) to support individuals and firms in applying the Code.

## Equality Code Review

### Introduction

1. The Council for Licensed Conveyancers has approved an initial 12-week public consultation and review of the CLC's current Equality Code (see Annex 1). The proposed amendments are set out in the revised Code (see Annex 2).
2. Provisions in the CLC Equality Code and the principles and outcomes that they mirror in the [Code of Conduct](#) flow primarily from **Objective 6** in the Legal Services Act 2007, which requires regulators to "encourage an independent, strong, diverse, and effective legal profession". What this means in practice is set out in more detail by the Legal Services Board (see Annex 3).
3. The Equality Code has been in force for a number of years, and in keeping with good administrative practice a review was included in the CLC Business Plan for 2021.
4. This consultation paper proposes the addition of **two new requirements** to our Equality Code, on:
  - **data collection;** and
  - **complaints reporting.**

These two requirements do not form part of the Code of Conduct at present. If other significant issues are raised as a result of this initial consultation, the CLC will consider whether to run a second consultation on a revised Equality Code that takes into account feedback from this process.

5. The CLC's Council has approved in principle (and subject to the results of this consultation) the proposed amendments described in this paper as set out at Annex 2.

### Aims of this consultation

6. We are seeking your views on whether the **Equality Code** is up to date and clear in the expectations it sets out.
7. We are **also** seeking your views on whether any other aspect of the Equality Code, Code of Conduct or wider regulatory arrangements should be amended to enable the CLC to better meet its obligations under our Regulatory Objective above.

### Regulatory and legislative framework and expectations

8. The CLC and other legal services regulators must meet the regulatory objective "to encourage an independent, strong, diverse and effective legal profession." This is because it is important that the legal profession reflects – to the greatest extent possible - the diversity of the population it serves.

9. The Legal Services Board (LSB) monitors the CLC's efforts to meet this regulatory objective. Its statutory guidance includes four outcomes which the CLC must establish the best way to meet.<sup>1</sup> These are:

- i. The CLC continues to build a clear and thorough understanding of the diversity profile of its regulated community, how this changes over time and where greater diversity in the workforce needs to be encouraged.
- ii. The CLC uses data, evidence and intelligence about the diversity of the workforce to inform development of, and evaluate the effectiveness of, its regulatory arrangements, operational processes and other activities.
- iii. The CLC collaborates with others to encourage a diverse workforce, including sharing good practice, data collection and other relevant activities.
- iv. The CLC accounts to its stakeholders for its understanding, its achievements and plans to encourage a diverse workforce,

10. Further, in 2020 the LSB stated that within this framework of outcomes, regulatory bodies should have:<sup>2</sup>

- i. An understanding of the composition of the regulated community.
- ii. An understanding of the barriers to entry and progression within the regulated community, and a programme of activity to mitigate those barriers with measures in place to evaluate effectiveness; and
- iii. Measures in place to understand any differential impact on protected characteristics within their disciplinary/enforcement procedures.

### **Appropriate approaches for regulators to take to promote diversity and equality**

11. This is a question that the LSB has also explored with frontline regulators. It was prompted by the very slow changes in the makeup of the legal profession, despite the many initiatives and interventions aimed at lowering barriers to entry and ensuring fair progression to senior roles. Notably for those who are vulnerable, or who have protected characteristics.

### **Proposed amendments to the Equality Code to promote diversity and equality**

#### A - Data collection

12. The Bridge Group's recent literature review 'Legal regulation to promote diversity and inclusion', observes that the primary focus of the LSB's regulatory interventions so far has been on data monitoring. However, these have been met with varying levels of compliance by regulators, and regulators that "still only have a partial picture of the demographic composition of their workforce."

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<sup>1</sup> Guidance for legal services regulators on encouraging a diverse workforce, Legal Services Board (February 2017), [https://legalservicesboard.org.uk/what\\_we\\_do/regulation/pdf/2017/S162\\_Guidance\\_For\\_Regulators\\_On\\_Encouraging\\_A\\_Diverse\\_Profession.pdf](https://legalservicesboard.org.uk/what_we_do/regulation/pdf/2017/S162_Guidance_For_Regulators_On_Encouraging_A_Diverse_Profession.pdf)

<sup>2</sup> Legal Services Board, Diversity and Inclusion, <https://legalservicesboard.org.uk/about-us/diversity-and-inclusion>

13. The report also notes that there is currently also a disconnect between data collection and action and recommends that the LSB should provide more information and clarity on the purpose of data collection, as well as expert advice on how it should be used and analysed by regulators.<sup>3</sup>
14. The CLC agrees with the recommendations made by the report in relation to data monitoring and collection. In anticipation of further guidance from the LSB, and to meet the outcomes set by the Legal Services Act 2007 and the LSB's statutory guidance described above, the CLC needs to be able to collect and analyse reliable data about its members, their owners, and the people they employ.
15. Good regulatory arrangements, processes, and interventions all stem from reliable and comprehensive data. The proposal in this consultation therefore is intended to generally make it easier for the CLC to collect diversity data.
16. Since the introduction of the Equality Code the CLC has carried out three diversity data collections of its regulated community. The surveys were carried out in different ways, dependent on the advice and expectations of the LSB at the time of collection.
17. We have found that when information is collected directly from individuals employed in regulated practices the response rate is better than when data about employees and owners is collected from practices.
18. However, collecting the data directly from individuals in the workforce is not the preferred method, as it is more consistent to contact firms as a whole. As such, this also fits with the wider approach of the CLC on improved evidence / data collection. For example, via recent proposals for an annual continuing competence evidence-gathering process, which is aimed at the firm rather than individual level.
19. Therefore, we are proposing the addition of a new Specific Requirement to the Equality Code which will apply to regulated entities:

*"7. Regulated Entities will cooperate with the CLC in the collection and analysis of data about their workforce and owners as may be required by the CLC from time to time."*

20. Note that this new requirement only applies to regulated bodies and does not oblige individuals to provide information.

#### B - Reporting complaints data

21. It is appropriate for the CLC as a regulator to examine where regulated bodies and individuals are or may be failing to comply with our regulatory arrangements and expectations.
22. To help achieve this, the CLC needs to be able to collect data on all complaints related to discrimination, victimisation, and harassment made by employees of a practice, its clients or

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<sup>3</sup> Bridge Group, 'Legal regulation to promote diversity and inclusion: literature review' (Legal Services Board, May 2021), p12, <https://legalservicesboard.org.uk/wp-content/uploads/2021/05/Bridge-Group-Legal-Regulation-Literature-Review.pdf>

members of the public. Where this data provides evidence of non-compliance with the Code (or other issues more broadly) the CLC will then be able to take proportionate action.

23. We are therefore proposing the addition of a new Specific Requirement to the Equality Code to:

*“8. When required by the CLC, Regulated Entities will report any instances of complaints of discrimination, victimisation or harassment whether as an employer or service provider. Regulated entities will keep records of, and when required by the CLC report any instances of complaints of discrimination, victimisation or harassment made against the Regulated Entity as an employer, a service provider, against an employee, or in any other capacity. (For example, when interacting with legal or other colleagues, or members of the public who are not clients).”*

24. CLC will make additional guidance available relating to recording and reporting such complaints. This, as well as the specifics of the data requested, may change from time to time.

#### Other amendments

25. The other proposed amendments are expanding and moving the definitions of vulnerable client and protected characteristics from the footnotes into the main text of the Code. This is intended as a clarification and does not have any effect of regulatory obligations.

#### Guidance

26. We are not consulting on specific paragraphs/sections in the Guidance to the Code as a final version will emerge once comments on this consultation process are received and fully analysed. However, an indicative *example* of how Guidance may potentially be structured is attached for illustrative purposes (see Annex 4). This will be updated and circulated more widely once the Code is finalised. However, any general advice or insights into such guidance (and other supporting material that will flow from it) would be welcome – please see Question 4 below.

## **Consultation Questions**

### **The Equality Code**

1. Do you think that the Equality Code is up to date and clear on the expectations and obligations it sets out for those regulated by the CLC?
2. Do you agree with the proposed addition of the new Specific Requirement relating to data collection at paragraph 7 of the revised Equality Code?  
If not, why not?
3. Do you agree with the proposed addition of the new Specific Requirement relating to reporting complaints data at paragraph 8 of the revised Equality Code?  
If not, why not?

### **General Advice / Content**

4. Are there any other aspects of the Equality Code, Code of Conduct, Regulatory Arrangements, or draft Guidance that should be amended/added to enable the CLC to better meet its obligations under Regulatory Objective 6?
5. Are there any other comments or insights you would want to share at this stage?



## Annex 1

### Current CLC Equality Code

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#### Equality Code

In this Code ‘you’ refers to individuals and bodies regulated by the **CLC**; all individuals and bodies regulated by the **CLC** must comply with this Code. You must not permit anyone else to act or fail to act in such a way as to amount to a breach of this Code.

#### Outcomes-Focused

The Code of Conduct requires you to deliver the following Outcomes:

- The service is accessible and responsive to the needs of individual Clients, including those who are vulnerable; (Outcome 6.1) <sup>4</sup>
- No-one – Client, employee, colleague, job applicant, trainee, or other party – you deal with feels discriminated against (whether directly or indirectly), victimised or harassed. (Outcome 6.2) <sup>5</sup>

Accessible employment and business **arrangements** help you deliver these **Outcomes** and requires you to act in a principled way:

1. Promote Equality of Access & Service. (Principle 6)
2. You comply with relevant **Equalities legislation**. (CoC P6a)
3. You make reasonable adjustments to prevent persons with disabilities from being placed at disadvantage. (CoC P6b)
4. You provide equal opportunities for all partners, **employees** or applicants in employment and training. (CoC P6c)
5. You make all reasonable efforts to ensure your service is accessible and responsive to **Clients**, including those with vulnerabilities. (CoC P6d)

#### You must also comply with the following specific requirement:

6. Any allegation of (direct or indirect) discrimination, victimisation and harassment is investigated thoroughly, resulting, where appropriate in disciplinary action. (CoC P6i)

Should you require information on how to meet your responsibilities under this Code, please see the **CLC’s Equality Guidance**.

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<sup>4</sup> A **Client** may be vulnerable because of a range of characteristics, including (but not limited to): basic skills: literacy and numeracy; complexity and confusion; difficulty of accessing and understanding large amounts of information; disability or other impairment; mental health issues; distress or sudden change in circumstances e.g. bereavement, divorce, illness or loss of employment; low income; age; caring responsibilities; limited knowledge of, or limited skills in, use of English; balance of power; lack of competition and choice; or inexperience or lack of knowledge of a particular subject. Vulnerability can only be assessed on a case-by-case basis.

<sup>5</sup> On the grounds of age, disability, gender reassignment, marital and civil partnership status, pregnancy and maternity, race, religion or faith, sex or sexual orientation.

## Annex 2

### **New Proposed Equality Code**

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In this Code ‘you’ refers to individuals and bodies regulated by the **CLC**; all individuals and bodies regulated by the **CLC** must comply with this Code. You must not permit anyone else to act or fail to act in such a way as to amount to a breach of this Code.

This Code draws together relevant elements of the Code of Conduct and adds two specific requirements at **paragraphs 7 and 8** that are not in the current Code of Conduct.

#### **Outcomes-Focused**

The Code of Conduct (CoC) requires you to deliver the following Outcomes:

##### Outcome 6.1

The service is accessible and responsive to the needs of individual Clients, including those who are vulnerable; (Outcome 6.1)

A Client may be vulnerable because of a range of characteristics, including (but not limited to): basic skills: literacy and numeracy; handling complexity and confusion; difficulty of accessing and understanding large amounts of information; disability or other impairment; mental health issues; neurodiverse conditions (e.g. dyslexia or ADHD); distress or changes in circumstances (e.g. bereavement, divorce, illness, menopause, or loss of employment); low income; age; caring responsibilities; limited knowledge of, or limited skills in, use of English; educational issues; balance of power; lack of competition and choice; or inexperience or lack of knowledge of a particular subject.

It is important to note that vulnerability can only be assessed on a case-by-case basis, and may relate to more than one category above.

##### Outcome 6.2

No-one – whether Client, employee, colleague, job applicant, trainee, or other party – you deal with feels discriminated against (whether directly or indirectly), victimised or harassed.<sup>6</sup>

This outcome relates to the legally protected characteristics of age, disability, gender reassignment, marital and civil partnership status, pregnancy and maternity, race, religion or faith, sex or sexual orientation.

Accessible employment and business **arrangements** help you deliver these **Outcomes** and requires you to act in a principled way:

1. Promote Equality of Access & Service. (**CoC** Principle 6).
2. You comply with relevant **Equalities Legislation**. (**CoC** P6a).

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<sup>6</sup> On the grounds of age, disability, gender reassignment, marital and civil partnership status, pregnancy and maternity, race, religion or faith, sex or sexual orientation.

3. You make reasonable adjustments to prevent persons with disabilities from being placed at disadvantage. (**CoC** P6b).
4. You provide equal opportunities for all partners, **employees** or applicants in employment and training. (**CoC** P6c).
5. You make all reasonable efforts to ensure your service is accessible and responsive to **Clients**, including those with vulnerabilities. (**CoC** P6d).

**You must also comply with the following specific requirements:**

6. Any allegation of (direct or indirect) discrimination, victimisation and harassment is investigated thoroughly, resulting, where appropriate in disciplinary action. (**CoC** P6i).
7. Regulated Entities will cooperate with the CLC in the collection and analysis of data about their workforce and owners as may be required by the CLC from time to time
8. When required by the CLC, Regulated Entities will report any instances of complaints of discrimination, victimisation or harassment whether as an employer or service provider. Regulated entities will keep records of, and when required by the CLC report any instances of complaints of discrimination, victimisation or harassment made against the Regulated Entity as an employer, a service provider, against an employee, or in any other capacity. (For example, when interacting with legal or other colleagues, or members of the public who are not clients).

### **RO6 – Encouraging an independent, strong, diverse and effective legal profession**

44. This regulatory objective is broad and covers key considerations concerning suppliers of legal services. There is overlap with other objectives here as there is a strong public and consumer interest in there being an independent and diverse legal profession available to assist those in need, to encourage public confidence and the perceived legitimacy of the profession. It is from this perspective that we approach this objective.
45. The focus on encouraging a diverse profession is central to this objective. We believe that the intention should be for the legal profession, across all its arms, to reflect the diversity of society. The extent to which the profession is seen by the public to be diverse is relevant as well.
46. The objective also encompasses independence. This relates to the importance of providers being independent from government and other influence, such as financial incentives, which could undermine their independence. A client should be confident that their provider will advise and act in their interests, subject only to their overriding duty to the court.
47. We believe that the references to a strong and effective profession flow from the profession being independent and diverse. For example, if the legal profession is drawn from across the diversity of the population then it should be strong as a result of using the broadest possible range of talent.
48. The duty is to “encourage”, which reflects the fact that this regulatory objective creates proactive obligations. It recognises that working with other organisations might be required.
49. The LSB is also subject to the public sector equality duty which requires us to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out our activities. These requirements overlap with this regulatory objective.

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<sup>7</sup> [Regulatory objectives \(legalservicesboard.org.uk\)](http://legalservicesboard.org.uk)

(To note – at the time of publication this is being revised by the LSB).

## Annex 4

### Draft Indicative Example - Supporting Guidance on the Equality Code

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#### **To Note –**

Depending on the outcome of the consultation and approval process, the CLC will be considering a range of supporting material to ensure the Equality Code can be applied as effectively as possible. This process will, for example, include consideration of items such as Guidance, templates/ example policies for firms, websites that offer further advice, etc.

The Guidance will naturally form a core part of this, from which other supporting material noted above will flow once it is finalised.

The draft below is included as one optional example of how that guidance could potentially be structured, and the draft content, language and tone are illustrative at this stage.

#### **Introduction**

This guidance is intended to support the organisations and individuals we regulate to further understand and adhere to the CLC's Equality Code. One driver of this is the Legal Services Act (2007). The CLC have a range of statutory obligations set out in the Act, one of which is meeting the regulatory objectives, including t "encouraging an independent, strong, diverse and effective legal profession". This objective is shared by all the regulators covered by the Act.

More specifically, in our own sector, the CLC has also published a guide to the benefits of diversity in conveyancing:

<https://www.clc-uk.org/lawyers/the-advantages-of-diversity/>

Conveyancers are responsible for upholding the reputation of the profession in their professional and personal life, and for treating people fairly and with dignity and respect. The guidance below has been designed to help support individuals and firms deliver that.

#### **Approach**

Under the Code firms should – at a minimum - consider, plan and deliver appropriate policies and procedures relating to equality and diversity. In relation to equality legislation, these should be proportionate to the size of your firm, the number of clients, and your client base (actual, and potential).

The approach should also continually include an awareness of previous issues that have emerged, and a plan to tackle them. These should be underpinned by a clear system to capturing, responding to, and filing complaints. As well learning from their outcomes.

## Recommend Steps

### Policy

Each firm is encouraged to consider drafting and publicising a clear policy to assist wider understanding of these issues. A clear policy will also help provide assurances that the matter is a serious one and can be used to flag the firm's support to staff, clients and others.

- Firm: Work practices - (if applicable - e.g. for larger firms, rather than sole practitioners) it should cover recruitment, retention and progression (see below).
- Firm: Outside of Work - it should note the responsibility for making sure personal views do not bring the profession into disrepute. This includes, for example, expressing offensive or extreme political opinions in public, or on social media platforms.
- Clients / Others – It should explain to current and potential clients / partner organisations how you consider equality and diversity issues.

### Scope

For internal / work-focused sections of the policy (especially, but not just for larger firms), you should consider how the policy can be applied across the life cycle of employment. Some of the main areas are summarised below.

- Recruitment adverts (content / platforms)
- Selection panels
- Access to work (fair allocation)
- Ability to work (reasonable adjustments – see below)
- Appraisals
- Retention of staff
- General progression / training issues.
- Promotion
- Staff leaving (e.g. factors / causes, the role of an independent exit interview process, etc)
- Complaints and grievances handling.

### Disability issues / Reasonable adjustments

There is a specific legal obligation to provide reasonable adjustments for disabled clients and employees.

As per the Equality Act, if an individual is at a substantial disadvantage that steps should be taken to make reasonable adjustments to reduce or remove the disadvantage.

It is also important that firms cover the costs of providing any adjustments, and they are not passed down. Beyond this specific point, it is good practice to implement reasonable adjustments where practical, e.g. for staff who are seriously ill.

(Some examples of reasonable adjustments can be found in Annex 5).

### Statement / Guidance

The above policies and processes can be captured in a straightforward and short statement for staff, clients and others (e.g. property companies you may regularly engage with). Alongside any legislative requirements it could be used to set out your commitment to equality and diversity. For example, stating there is no tolerance of harassment in your workplace, and how you protect staff and clients, and their data. And signpost sources of advice and information.

### Training

Once established, the above can then be applied via regular equality and diversity training for all staff. Anonymised example of clients or situations, in the form of specific case studies, may be helpful in some instances, e.g. where the firm has a diverse client base, or helped someone with several vulnerabilities.

### Review

Once a policy is embedded it could evolve in response to factors that may be within or outside of a firm's control. As part of the process to deliver an effective approach we would make a recommendation to ensure firms:

- Conduct a regular (at least annual) review of quality and diversity. (Whether or not the policy is formally documented or public)
- Ensure it specially assesses disability issues / reasonable adjustments – see below
- Notes any patterns, whether long-standing or evolving
- Develop criteria for assessing how their policy is being implemented (or not)
- Formally record any findings (even if this states there are few issues)
- Log and review the actions taken following those findings (to reduce risks).

### Complaints – Clients

If any client raises a complaint, it is important that you follow our CLC Code on Complaints. And make a clear note it refers to equality and diversity, either in an existing log, or a separate one dedicated to such issues.

<https://www.clc-uk.org/handbook/guidance/>

<https://www.clc-uk.org/consumers/reporting-problems/>

## Complaints - Employees

If you have equality and diversity concerns about your firm, you are advised to:

- Complain informally to your employer.
- Raise a grievance using the formal grievance procedures
- Make a claim to the Employment Tribunal. (At the time of publication this has to be logged within 3 months – minus 1 day – of the original incident occurring).

If this last route is taken, it is possible you may have to start a case before you have completed the processes within your firms.

It is recommended you record and write down what occurred as soon after the incident(s). Or consult with someone else so they can do so. It is important to capture the details of what was said or done (or not done) by whom, when, and where.

These can relate to a protected characteristics, discrimination, victimisation and harassment, although at times it can be complex to know where the line between them may be. Further advice on such issues can be obtained from Citizens' Advice, trade unions or LawCare (see links below).

## Complaints - Whistleblowing

For particularly systematic or multiple instances of harassment or discrimination, and/or where the above approach may not be either practical or safe, the CLC has also published advice on whistleblowing.

<https://www.clc-uk.org/wp-content/uploads/2017/12/190219-Whistleblowing-Policy-CLEAN-1.pdf>

## Data Collection

We require that firms regularly and clearly record, keep, monitor and act on data covering:

- Any comments / requests from disabled individuals raising any need for reasonable adjustments
- Any complaints - notably, but not just on legally protected characteristics.

Other areas we ask firms to capture data related to the 'Scope' listing above. For example, the number and percentages of staff from different groups should be recorded and updated as a base, from which to establish other data (such as on promotions).

In the absence of recorded data, it is harder to identify areas that most need attention, and how they are changing. There can be concern about how and why it is collected, so it is recommended that when doing so, a clear explanation is included, including: what it will support; why; how it will be treated as confidential; who has access to it; under what circumstances; and the fact it not compulsory. (This may be something you also wish to capture in your 'Statement' – see above).



## Work assignments

Firms should consider if possible, keeping a database of work allocated to trainees, other staff, and those returning from parental or other kinds of leave. This should note the nature of work allocated, earnings (which should already be listed elsewhere) and quantity / level of work.

## Additional Sources of Information

Please see below for an illustrative list of wider resources.

(NB Further examples are to be continually identified, reviewed and added, e.g. on Menopause, Mental Health, and Covid issues).

- <https://www.equalityhumanrights.com/en/advice-and-guidance>
- <https://www.equalityhumanrights.com/en/advice-and-guidance/guidance-employers>
- <https://www.acas.org.uk/improving-equality-diversity-and-inclusion>
- <https://diversityandinclusioninlaw.com/category/diversity/>
- <https://www.equalityhumanrights.com/en/multipage-guide/how-challenge-discrimination-work>
- [Discrimination - Citizens Advice](#)
- [LawCare is the mental health and wellbeing charity for the legal community.](#)

## Annex 5

### Examples of Reasonable Adjustments (for Draft Guidance)

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The following is an illustrative and non-exhaustive example of some reasonable adjustment for firms to consider. These could apply, for example, for clients, or potential staff coming in for an interview with the firm.

- Building adjustments – consider making physical changes to a workplace, for example, installing an audio-visual fire alarm for a deaf person.
- General / Other adjustments – actively looking at doing things another way. Examples include:
  - Ensuring a wheelchair user can work / visit on the ground floor.
  - Changing equipment, e.g. providing a special keyboard if someone has arthritis
  - Arranging for someone with neurodiversity issues or anxiety disorders to have their own desk instead of hot-desking (where that is relevant and is their preference).
  - Allowing employees who become disabled to make a phased return to work, and actively consider flexible hours or part-time working
- Review communications – to ensure they are as accessible as possible in content, format and appearance.
- Review webpages – for example, ensure you have an easy to access and navigable website. You may want to consider a specific section for those with disabilities. The website could have a section that includes photographs of the inside and outside of the office premises, and any parking arrangements. This would allow potential visitors to factor in and plan for access issues.
- Publicity and promotion – note that you offer reasonable adjustments. As this would increase the chances a disabled person would consider using or applying to the firm. As part of this you could highlight if any staff has specific experience or training in working with individuals with disabilities.
- Planning ahead – firms could proactively ask every client/potential staff member etc if they need any reasonable adjustments to be made. Some disabilities are not visible or apparent, so assumptions should not be based on appearances.
- Regular Training - all staff in understanding and identifying potential issues that disabled people might face.