



**Annex 2**

# **Arrangements for SRA regulation of non-authorised CILEX members**

**(DRAFT) Consultation Response**

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**June 2024**

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## Executive summary

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This document outlines our response to the feedback to our consultation on our proposals for the regulatory arrangements of non-authorized CILEX members.

As we set out in our consultation, non-authorized CILEX members include:

- Chartered Paralegals
- CILEX Paralegals
- CILEX students

Further definitions of each group are included in our consultation on non-authorized members. None of the non-authorized CILEX members are authorized to carry on any reserved legal activity.

We have previously identified potential benefits to accepting CILEX's redelegation of regulation of non-authorized CILEX members. This, for example, could make the regulatory landscape easier to navigate and provide more consistent levels of protection and information for the public.

We have considered the feedback to our consultation on non-authorized CILEX members and for the reasons given in this document, we are recommending that if we agree to accept the redelegation of CILEX regulation, we should also accept the regulation of non-authorized CILEX members.

Where respondents have given their permission, we have published their full response.

## Background

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CILEX wrote to the Chair of our Board in July 2022, inviting us to engage in formal discussions on the potential to redelegate the regulation of CILEX members and entities from CILEX Regulation (CRL) to the SRA. The Board agreed that taking on the regulation of authorized CILEX members and firms had the potential to deliver tangible benefits to consumers of legal services and the wider public by:

- simplifying the complex regulatory landscape and making it easier for consumers to navigate and;
- bringing more consistent levels of protection and information for consumers.

We did not make a specific decision regarding the redelegation at this stage but instead developed proposals on how we would regulate CILEX members if redelegation of their regulation to us proceeded.

We consulted on our proposed regulatory arrangements for authorised CILEX members from 31 August to 22 November 2023 ("our first consultation"). In parallel, CILEX ran a consultation on its proposals for all its members, including changing its membership structure and re delegating the regulation of CILEX members from CRL to us. We stated in our first consultation that we would await the results of the CILEX consultation before taking forward a programme of work to consider how appropriate regulatory arrangements could be put in place for non-authorised members of CILEX if re delegation occurred.

Following the conclusion of its consultation, in December 2023 CILEX wrote to us and formally asked us to confirm that we were willing to take on the regulation of CILEX members and to explore specific areas of its own consultation. The most significant area raised, in terms of requiring us to undertake further work and consultation, was around our willingness (and approach) to providing regulation of non-authorised CILEX members.

Some stakeholders responding to our first consultation said that moving only one part of the membership to the SRA, as a first phase of changes in regulatory arrangements for CILEX members, would lead to regulatory fragmentation. It was said that if the CRL was left overseeing the remaining non-authorised members this would be a retrograde step for the regulation of those individuals.

The consultation on our proposals to include non-authorised CILEX members within our regulation, if re delegation proceeded, ran from 20 March to the 15 May 2024.

We considered arrangements for all non-authorised CILEX members. This included individuals who either work in current SRA regulated firms or in those authorised by CILEX totalling around 87% of CILEX membership, according to CILEX data. We also considered arrangements for the 1,000 or so non-authorised members outside of SRA or CILEX firms, recognising that some of these would be supervised in any event by an SRA or CILEX authorised person.

Several documents previously drafted as part of our proposals for authorised members were amended to include non-authorised members. These included our:

- draft Principles and Code of Conduct for CILEX members
- proposed sanctions and controls for CILEX members
- consequential amendments to the SRA Standards and Regulations.

During this period, we also continued to engage with stakeholders including the Legal Services Consumer Panel with a focus on generating consumer benefits of regulatory simplification and avoiding any potential consumer confusion.

## Who we heard from

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We received 13 responses to the consultation from:

- CILEX Regulation (CRL)
- Liverpool Law Society (LLS)
- National Association of Licensed Paralegals (NALP)
- The Legal Services Consumer Panel (LSCP)
  1. The Law Society
  2. Seven CILEX members (this included five identifying as CILEX lawyers, CILEX fellows or Chartered Legal Executives, one as a CILEX member and one as a non-authorized CILEX member).
  3. One other individual identifying as a student.

We also carried out direct engagement as part of our consultation. This included engaging with other organisations that might be directly impacted by the change, including CILEX and the Office of the Immigration Services Commissioner. We are grateful to everyone who responded to the consultation and took the time to engage with us about our proposals. We have carefully considered the feedback we received in developing our final positions.

## Our position

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In this section we outline each consultation proposal. We set out a high-level summary of the responses we received, our next steps and our rationale.

The focus of our consultation was our proposed regulatory arrangements.

Most of the individuals responding generally supported our detailed proposals, although a couple of respondents made comments that related more to our first consultation on authorised CILEX members, which closed in 2023.

The LSCP, whilst saying that in principle the SRA regulating both authorised and non-authorized CILEX members together was the right idea, stated that there was insufficient evidence to support the proposed redelegation at this time.

Several other organisational responses (in particular from CRL and the Law Society) disagreed with the proposals in terms of possible impacts on professionals, non-authorized persons and consumers. Both the CRL and the Law Society also repeated their objections to the redelegation of regulation of all or any CILEX members in principle. We have confined ourselves in this response to dealing with the comments on the issue of whether, if redelegation occurs, the SRA should take on regulation of non-authorized CILEX members at the same time as authorised members and the questions that were asked in the consultation.

## Our detailed proposals

The remainder of this document summarises the responses we received under themes that were set out within our consultation document and sets out our position.

Please note the numbers of those responding have been too small to undertake a statistical analysis of the responses.

The following specifically focuses on feedback relating to our consultation on non-authorised members.

## **Regulatory Standards: General**

### **What did we propose?**

We proposed changes to our regulatory model to bring non-authorised CILEX members within the scope of SRA regulation, if redelegation occurred.

### **Respondents' views**

Most individual respondents had no specific comments on the draft changes to SRA Standards and Regulations. One respondent identifying as CILEX Fellow/Legal Executive felt that we were taking a sensible approach for the time being, but the approach needed to be regularly reviewed.

A key point of principle raised by the Law Society in its response to the second consultation was that there was no case for the SRA regulating non-authorised members. It said that SRA would add extra burdens to those members by bringing them within its regulation and that they should be managed by CILEX via its membership provisions only. It also argued that there was a lack of detail in the proposals, including an evidenced case for change and clarity of costs for the professions and consumers.

CRL stated that they welcomed our decision to consult on proposals for non-authorised CILEX members. They stated, however, that they were concerned by our proposals and said that the proposed arrangements in relation to CPD would not match the current levels of consumer protection under their regulation. They also stated that they did not feel that our proposals adequately addressed how the non-authorised CILEX members who did not work in SRA regulated firms would be regulated.

The LSCP stated that "If the interest of consumers is at the heart of these considerations, then it makes perfect sense to transfer the oversight of standard setting, investigation, and enforcement to the SRA. This will ensure continuity in consumer protection and remove/reduce regulatory arbitrage in the sector. Therefore, in principle, we broadly support the approach of the SRA regarding un-authorised persons." They, however felt that research undertaken by CILEX and the SRA, alongside the consultations, was not of sufficient quality.

### **Our response**

Overall, the changes would mainly be a transfer of existing regulatory principles, functions and processes across regulators operating to the same statutory objectives and oversight. CRL already regulates non-authorised individuals, and so redelegation of such regulation to us would not be a fundamental change in current arrangements for the legal services sector.

We do not consider that our proposals would materially increase the burdens on non-authorised CILEX members. In fact, where those non-authorised CILEX members work in an SRA regulated firm, redelegation would bring the simplification of reporting to a single regulator. Around 87% of non-authorised CILEX members already either work in SRA authorised firms or in the very small number of firms currently authorised by CILEX (a number of which would passport over to SRA regulation anyway if redelegation occurs).

Our consultation for non-authorised members also considered arrangements for the 1,000 or so non-authorised members outside SRA or CILEX regulated firms. They would have obligations under the proposed SRA- CILEX Code to ensure that consumers knew how they were regulated and who to complain to. We also recognised the diversity of CILEX members within our consultation and have integrated consideration of this diversity within our impact assessments where relevant data has been available.

CRL's regulation of non-authorised members is part of its arrangements that have been approved by the LSB. Removing independent regulation from these members would be seen as a lowering of standards. Splitting up the regulation of current CILEX members would also lead to regulatory fragmentation rather than consolidation.

In its published response to our first consultation on authorised CILEX members, the Law Society stated that "Given the current arrangements of CILEX's membership, where members must adhere to the CILEX Code of Conduct with regulatory oversight from CRL, the proposal to move only part of the membership to the SRA could be viewed as regulatory fragmentation, not consolidation. As a result of these proposals, CILEX would be left overseeing CILEX's remaining non-authorised individuals, which would be a retrograde step for the regulation and oversight of those individuals."

The consultation on non-authorised CILEX members set out our arguments for why we think that the changes would benefit consumers in our consultation, including:

- 1 simplifying the complex regulatory landscape and making it easier for consumers to navigate and;
- 2 bringing more consistent levels of protection and information for consumers.

Our view is that our work and CILEX's with consumers during our respective consultations, which evidences potential benefits for consumers, supports the potential benefit in relation to regulatory simplification. Our online survey of 1,000

consumers in December 2023 suggested that consumers had limited knowledge of the complexities of legal services regulation and might benefit from the consolidation of legal services regulators. These conclusions were supported by a further focus group held by CILEX and the SRA in June 2023. Although some stakeholders have made some criticisms of our research design, our view is that the research supports conclusions from previous work with consumers by ourselves and others.

The issue raised by CRL in relation to CPD is discussed below.

## **Regulatory Standards: Code of Conduct**

### **What did we propose?**

We made amendments to our draft SRA-CILEX Principles and Code of Conduct so it would also apply to non-authorized CILEX members. We considered that having one common code for all CILEX members would be simpler and more effective than separate Codes for authorized and non-authorized members.

### **Respondents' views**

Two respondents identifying as a student and a CILEX Fellow/Legal Executive, felt that our proposals for the Code were a good idea.

NALP recognised the rationale for having a single Code of Conduct for all CILEX members. It, however, also felt that the wording of our proposals did not clearly distinguish professional paralegal practitioners who worked outside authorized firms but still provided legal services directly to their own clients. They called for this to be addressed.

The Law Society, while generally questioning the benefits of redelegation, also felt it was logical to maintain one code of conduct for all CILEX members. The Law Society and LSCP also felt this should recognise the need for a flexible, non-standard approach to enforcement due to the diversity of the CILEX membership and more details should be made available on how this would be delivered in practice.

### **Our response**

We consider it appropriate that there should be one Code for all CILEX members.

Our consultation stated that we recognised that the roles of non-authorized members could vary significantly. Roles could include, for example, a senior paralegal who could be a manager in a firm handling their own cases or a student carrying out only limited delegated tasks. We stated that the particular role and responsibilities of CILEX non-authorized members could be considered when looking at how the standards are applied in any given circumstances, in deciding on enforcement action. We also distinguished our proposed enforcement approach for non-authorized CILEX members working within an SRA-regulated firm or under the supervision of one of



our authorised individuals, from our proposed approach to CILEX members outside such contexts.

## **Character and Suitability**

### **What did we propose?**

We would require non-authorised CILEX members to switch from basing their declarations of prior conduct issues on the CRL Prior Conduct guidance to our Character and Suitability test. As in the case of the Prior Conduct checks, this would be applied at the point of application for CILEX membership.

### **Respondents' views**

Individual respondents (including three identifying as a CILEX Lawyer or Fellow, one identifying as a non-authorised CILEX member, one identifying as CILEX member and one identifying as a student) responding to this specific question agreed with our proposals. Several individual respondents also emphasised the need to ensure that the process fully integrated CILEX members and did not operate against their interests.

The LSCP and LLS also accepted the rationale for our proposals. The Law Society felt that the application of our Character and Suitability rules would be logical if the SRA were to regulate CILEX members. They, however, stated that it would be more appropriate for CILEX to manage character and suitability requirements for non-authorised members.

### **Our response**

Public protection would be supported by us carrying out the Character and Suitability tests for non-authorised CILEX members as their regulator. Currently the Prior Conduct checks of these members, which require similar declarations, is undertaken by CRL. Our proposals, therefore, would represent limited changes to current arrangements.

## **Investigation and Enforcement**

### **What did we propose?**

We proposed to take on CRL's disciplinary powers and to adopt substantially the same processes for reports that we apply to solicitors and other individuals and firms we currently regulate to all CILEX members (authorised and non-authorised). These processes would include triage, assessment, investigation, notice and decision.

### **Respondents' views**

Most of those responding to this question had no comments that they wished to make in response to our specific questions on investigation and enforcement.

One respondent identifying as a Fellow/Legal Executive agreed that the same investigation and enforcement approach should apply to both solicitors and CILEX members. The respondent also felt our changes to our standards and regulations made sense but would need to be regularly reviewed.

LLS felt our proposals would be an improvement on existing arrangements, as we would be able to act against CILEX members in and outside our regulated firms.

The LSCP agreed with our proposed approach to the investigation and enforcement of non-authorised members but emphasised that we would need to balance this against the roles and responsibilities of different members. It stated that everyone subject to disciplinary action should be entitled to some form of appeal with independent scrutiny built in. It also objected to any parallel disciplinary proceedings.

The Law Society emphasised that the approach to enforcement would need to recognise the diversity of CILEX membership and that this would need to be reflected in training for SRA staff, creating additional costs which would need to be funded by authorised CILEX members. The Law Society felt that it would be more appropriate for CILEX to manage enforcement actions for non-authorised members. It also stated that the SRA would need to be clear about whether it would seek to replicate the approach of the SDT within its own processes for CILEX members. There was also concern that under the proposals there would be a form of dual jurisdiction in relation to non-authorised CILEX members working in our regulated firms.

### **Our response**

Neither we nor CILEX would consider it appropriate for CILEX as a representative body to deal with disciplinary and enforcement proceedings against its own members. This would be seen as a retrograde step compared to the current independent regulatory arrangements which are approved by the LSB.

SRA staff are already experienced at dealing with the diversity of our regulated community.

As set out above, our enforcement approach recognises the importance of reflecting the particular roles taken on by non-authorised persons.

We would provide access to reviews and an appeal where the non-authorised CILEX member disagreed with our judgment about what the outcome of an enforcement case should be. These include an independent element via the use of adjudicators.

There would be the right to request an internal review of a first instance enforcement decision on the grounds that:

- the decision process was materially flawed, or

- there is new information that would have affected the decision if it had been considered.

Reviews would be considered by an adjudicator or panel of adjudicators, depending on who took the first instance decision.

The appeal would be conducted by a panel of adjudicators by way of a hearing, which will usually be held in private. The outcome may be to uphold our decision, to vary it or to reverse it.

We also set out our intentions in the consultation to work with CILEX to seek a statutory instrument with the aim of giving CILEX members the same external rights of appeal as solicitors and SRA firms. This would cover decisions on enforcement as well as authorisation.

We explained in our consultation that a dual jurisdiction (between CRL and the SRA) already exists for non-authorised CILEX members working in SRA authorised firms, and that this would be much simpler to manage if they were under one regulator. In the exceptional circumstances where we were considering an order under s43 of the Solicitors Act 1974 (or its equivalent under s99 Legal Services Act 2007) preventing the non-authorised CILEX member from being employed in a solicitors' firm, those proceedings may include action against the individual as a CILEX member which may result in termination of their CILEX membership and other disciplinary measures. The SRA would be able to deal with both issues as one streamlined set of proceedings, which would not be possible under the current arrangements.

## **Funding the Costs of Regulation**

### **What did we propose?**

Under existing arrangements authorised CILEX members' practice fees fund the regulatory costs of non-authorised members. Our proposals were that, at least initially, there would be a continuation of these arrangements.

### **Respondents' views**

Most individuals (including three identifying as CILEX Fellows/Lawyers, one identifying as a non-authorised CILEX member, one identifying as a CILEX member and one identifying as a student) responding our question on funding arrangements for the regulation of non-authorised members agreed with our proposals. One individual respondent suggested that these should then be regularly reviewed. NALP offered no objections to our approach, providing this was made clear in the CILEX membership agreement.

The Law Society stated that there was a lack of detailed information on likely costs, including as a result of transitional arrangements. It stated it would expect to see the SRA produce a full, current financial disclosure of CRL's accounts alongside a 3-year financial plan and projection of costs as evidence. The LSCP also felt there was

insufficient detail to make an informed decision about the cost and was concerned at this.

CRL stated that our proposals would not appropriately assign the costs of regulation to those who would benefit from such regulation and said that they were in favour of a change to the CILEX Charter so that non-authorized CILEX members would pay towards the costs of regulation.

Concern was also expressed by the LLS over whether the SRA could ensure that there would no-cross subsidy of regulation between the two professions.

### **Our response**

If redelegation proceeds we would maintain financial arrangements and transparency to ensure that each profession appropriately funds the costs of its regulation.

Detailed costings comparisons cannot be provided without access to CRL financial data which is not currently available. However, during development of our proposals, our initial calculations were that in terms of investigation, enforcement and authorisation costs, there could be savings in relation, for example, to the cost of panels and staff due to the fact that the SRA has an existing infrastructure which could be able to absorb CRL's wider functions at a lower cost.

Our proposals state that we would initially replicate the current CILEX policy to recoup the costs of regulation of all CILEX members (authorized and non-authorized) from the practising fees charged to authorized CILEX members.

In the case of non-authorized members, the costs of prior conduct checks and the fitness to practice processes are covered by authorized CILEX members practice fees, but all other costs are covered by CILEX membership fees.

As our final RIA describes, although we would ask CILEX members to base their declarations on our Character and Suitability test instead of the current CRL prior conduct checks, few changes would be introduced as a result. Our proposals for investigation and enforcement would mean that there would be similar processes in place as now for fitness to practice issues. In addition, there may be some synergies resulting from redelegation that offer efficiencies.

We, therefore, expect that the ongoing cost of the regulation element of the practising certificate fees to authorized CILEX authorized members will not be higher than its present level in real terms.

Beyond the immediate term, we note that CILEX has sought permission from the Privy Council to remove the current prohibition in its Charter against charging non-authorized members the cost of regulation. We therefore propose that, if redelegation proceeds, the issue of whether to charge non-authorized members for regulation after the first year of SRA regulation remains under review (with CILEX). This would

mean that changes could be made, if necessary, in the future so that we can continue to ensure that the regulation of CILEX members is self-funding.

Any fees that we charge would be subject to an annual application for a Funding Order to the LSB in the normal way.

## **Education and Continuing Competence**

### **What did we propose?**

We said that would not be 'authorising' individuals to become CILEX Paralegals or students.

Our role with the individual non-authorised CILEX members would primarily relate to character and suitability, and enforcement. We would deal with reports of breaches of the SRA CILEX Code of Conduct which could include breaches of the requirements in that Code to provide a competent service.

We said we would not take on the CRL mechanism for routine auditing of CPD records on an annual basis or have a role in assessing the continuing competence of non-authorised CILEX members in general.

### **Respondents' views**

Most of the respondents specifically responding to this question (including three identifying as a CILEX lawyer or fellow, one as a non-authorised CILEX member, one as a CILEX member and one as a student) agreed with our approach to issues relating to the education and continuing competence of non-authorised members. NALP also felt the proposals were reasonable. One CILEX Fellow responding to the consultation also stated that as the majority of CILEX members work in regulated SRA offices alongside solicitors, both should have to comply with the same CPD/competency requirements.

The LSCP also broadly agreed with our approach.

The Law Society supported our proposals not to become involved in education and competency standards for non-authorised members. It felt that CILEX should manage the continuing competency issues for non-authorised members for purely membership purposes. It stated concerns over us having a role in the oversight of approved education providers for CILEX members and felt that this contradicted our approach to the education of solicitors where we have no such role.

LLS also called for a formal information sharing agreement between us and CILEX for sharing of information relating to their members competence and the requirements of our Code of Conduct.

Although CRL did not directly address our consultation questions, it voiced concern over our proposals relating to CPD and felt that this represented a dilution of regulatory arrangements from a consumer perspective.

## **Our response**

For the solicitor qualification we have a centralised assessment run by us (through contract with Kaplan).. It is the SQE that gives us our assurance about competence.

The CILE qualifications are designed differently. They specify particular pathways and training requirements. And the training and assessment is run by third parties – not CRL. So, in order to have some quality assurance over the qualification, CRL must authorise the providers of the training and assessment. This is the way they quality assure the qualification/competence in the absence of a centralised assessment run by CRL.

We therefore intend to maintain this approach, recognising the different qualification routes for the two professions, and that both approaches have been approved by the LSB.

We believe that the primary role in relation to monitoring competence as a requirement for membership status for non-authorized members should not be with us as regulator.

It is also important to recognise the role of the firm and of any authorised persons in supervising competence. The draft SRA-CILEX Principles and Code of Conduct contains the following requirements on CILEX members:

*3.7 Where you supervise or manage others providing legal services: (a) you remain accountable for the work carried out through them; and (b) you effectively supervise work being done for clients.*

*3.8 You ensure that the individuals you manage are competent to carry out their role, and keep their professional knowledge and skills, as well as understanding of their legal, ethical, and regulatory obligations, up to date.*

It should also be noted that our continuing competency arrangements in relation to solicitors do not include routine checking of records, portfolios etc.

We agree that exchanges of information between us and CILEX including about competency concerns would need to take place within a formal framework.

## **The Regulatory Impact Assessment**

### **Our RIA**

The Regulatory impact assessment sets out what we had identified as possible impacts which could result from our proposals for non-authorized CILEX Members. Overall, we identified that our proposals would have positive or neutral impacts.

### **Respondents' views**

Those responding as individuals did not have comments on the assessment.

NALP did not agree with the statement that “both CILEX and non-CILEX staff” would come under our enforcement strategy” as it suggested that it would indicate that members of other organisations such as NALP would be affected by our proposals. They felt that we should clarify that there are other non-authorized persons in the legal services sector that do not come under the regulation of either CILEX or the SRA.

CRL stated that our proposals did not adequately address how non-authorized members who did not work in SRA regulated firms would be regulated, as well as the potential confusion of their clients resulting from the changes we had proposed.

TLS suggested that the regulatory impact assessment was insufficient and raised concerns that our proposals could potentially have a negative impact on our delivery of our statutory objectives relating to:

4. protecting and promoting the interests of consumers and enhancing consumer protection, particularly that our proposals would increase the potential for consumer confusion and impact negatively on consumer choice.
5. promoting and maintaining adherence to professional principles, claiming that our regulatory proposals would blur the lines between solicitors, authorized CILEX members and non-authorized CILEX members.
6. protecting and promoting the public interest, particularly that our adoption of the CRL funding model would not be justifiable as we already regulated many non-authorized CILEX members and authorized members may be required to cover the costs of an increasing number of non-authorized CILEX members. TLS also suggested that this would divert us away from focusing on the regulation of solicitors.
7. access to justice, with the suggestion that our regulation of non-authorized members would create barriers to new entrants to legal services.

### **Our response**

Our regulatory regime would not apply to non CILEX members outside of the firms that we regulate, and we would like to clarify that the statement in our consultation that “both CILEX and non CILEX staff would come under our enforcement strategy”

only applied to solicitors, CILEX members and other employees who work for one of our regulated entities.

We would ensure that our regulatory communications and guidance clarified the scope of our regulation of non-authorised persons in the legal services sector, including those working outside our regulated entities.

Our research findings have suggested that our proposals could support the protection and promotion of the interests of consumers and enhance consumer protection. We do not agree that our proposals will create an impression of equivalence, save that the public can be reassured that the professions are regulated to similarly high professional standards. Our regulatory requirements, including those in the SRA-CILEX Principles and Codes of Conduct, will help consumers to understand who regulates all CILEX members and what their practising rights are.

We have set out our commitment to maintain clear and separate identities for solicitors and authorised CILEX authorised members. For example, our website and wider media will use clear branding and explanatory information around the separate professions.

Our position on the funding of regulatory costs for non-authorised members is set out in a previous section.

CRL already regulates non-authorised members, and it has not previously been evidenced that this has acted as a barrier to entrants or negatively impacted on access to justice. We are not expecting our proposals to change this position.

## **The Equality Impact Assessment (EIA)**

### **Our EIA**

The Equality Impact Assessment sets out what we had identified as possible equality and diversity impacts which could result from our proposals for non-authorised CILEX members.

### **Respondents' views**

Those responding as individuals did not have any comments to add in relation to the equality impact assessment.

NALP felt that it was not clear whether there would be increases in costs for CILEX members. This included clients who did not qualify for legal funding and have a limited income. It was particularly concerned whether our proposals were likely to impact on the cost of PII for non-authorised CILEX members, such as paralegals working outside SRA regulated firms.

TLS highlighted that we had stated that we had access to limited data on the equality characteristics of unauthorised CILEX members.



## **Our response**

As our regulatory impact assessment describes, our proposals create relatively few changes in the regulatory principles, standards, and processes for non-authorized CILEX members. This means that we would not expect many impacts on these members.

Our proposals would not require non-authorized CILEX members to obtain PII.

It is not unusual for equality impact assessments to recognise limitations of available evidence. Our final impact assessments set out that we would seek to address gaps in our data to further assess impacts of implementation, at a later stage.