EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/practice/process/service:

Criminal prior approval: unusually large expenditure (ULE).

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

Review of current policy.

Key findings from this assessment (or reason why an EqIA is not required):

We consider this policy relevant to equality groups, particularly in relation to race in some circumstances, though its relevance may be broader. However, the relatively small number of applications makes a full analysis of the available data difficult. In addition, many forms of ULE have no connection to applicants' equality characteristics or associated needs.

Nonetheless, based on the available evidence, we conclude that the policy factors allow us to consider requests relating to any of the nine protected characteristics. Overall, the policy helps advance equality of opportunity and requires no amendment.

This specific aspect of the legal aid scheme has no obvious comparator, making it difficult to find external evidence directly addressing the policy's relevance or likely importance to different equality groups.

For clarity, an applicant's protected characteristics are not, in themselves, relevant to our decision-making: they must relate to the factors set out in the policy.

Summary of actions taken because of this assessment:

No specific actions were identified.

Ongoing actions beyond implementation include:

Ongoing actions include the gathering and analysis of data in relation to this policy. We intend to continue monitoring the grant rate in relation to protected characteristics, to establish more information on the impact of this policy on assisted persons with equality related circumstances.

Lead person(s) for this assessment (job title and department only):

Head of Criminal Legal Assistance.

Senior responsible owner (SRO) agreement that the policy has been fully assessed against the needs of the general duty (job title only):
Director of Operations.

Publication date (for completion by Communications):
12/11/2026.

Step 1: Scoping the work being assessed

1.1. Briefly describe the aims, objectives and purpose of the policy/practice/process/service.

SLAB's policy on prior approval for ULE sets out how SLAB operationalises and records the requirements of the relevant Regulation. The purpose of a policy statement is to identify a definition and a test to be undertaken by decision-makers where approval is sought to carry out work of an unusual nature. In this case the test is whether it is 'reasonable' to approve the proposed ULE. We then define what is meant by 'unusual large' expenditure. The relevant section of the policy statement is set out below.

Our policy is that 'unusually large expenditure' (ULE) is defined as expenditure on a single item of work above £2,000 (excluding VAT), where the proposed expenditure has not already been covered by a grant of approval in relation to experts[1] or unusual work.

If we have already provided approval for an expert witness to provide a report under via prior or retrospective approval for an expert, and the solicitor needs to cite the expert to give evidence in court, where this is expected to cost more than £2,000 (and again, where this involves a single rather than cumulative cost above the threshold), a request for approval for ULE will also be required. The original grant under expert prior approval ***does not*** cover this work where the expected cost of a single item (for example, travel) is more than £2,000.

Otherwise, where the cost of work a solicitor seeks to carry out is below the unusually large threshold set out above, SLAB's prior approval is not required before the work is undertaken.[2]

Test applied

Where the proposed work falls within the definition above, the policy test for approval is **whether the proposed work is reasonable in all the circumstances of the case.**

SLAB will grant a request to incur ULE as reasonable where the request demonstrates that:

- that the proposed work could reasonably be expected to assist in advancing the case or in its resolution (including discontinuation of the proceedings); and
- where the request demonstrates due regard to economy in terms of how the work is to be undertaken and in the breakdown of costs provided.

[1] Where the cost of instructing an expert (for example, to provide a report would cost more than £2,000), this would require approval for an expert witness, not ULE.
[2] However, if the work is unusual in nature, SLAB's prior approval is always required, regardless of proposed cost – again, see separate policy statement.

1.2. Why is the policy/practice/process/service being examined?

Review of policy/process/service/practice.

1.3. Who is affected by this policy/practice/process/service?

The customer for the purpose of this policy is the assisted person, in whose case the solicitor is requesting to incur ULE. The extent to which assisted persons (and by connection, their solicitors) can incur ULE will be affected by how we set policy in this area.

1.4. Policy/practice/process/service implementation date.

Currently live.

1.5. What other SLAB policies or projects may be linked or affected by changes to this policy/practice/process/service?

As the policy statement explains, what SLAB approves at this stage is linked to what may ultimately be paid for. Changes to SLAB's policy on what is likely to be 'reasonable' may therefore affect what can be paid for later.

Step 2: Consider the available evidence and data relevant to your policy/practice/process/service

2.1. What information is available about the experience of each equality group in relation to this policy/practice/process/service?

General information about the policy/practice/process/service

In 2024-25, we received 67 requests in relation to ULE: this is a low volume in comparison to the other others of criminal prior approval (particularly counsel and experts). Around two thirds of requests were made in the context of solemn proceedings.

Of total requests, only 15% were granted. This is primarily because, as with our policy on unusual work, a very large proportion of requests submitted were refused on the grounds that the request made should have been for an expert; or was otherwise unnecessary (for instance with regards to most interpreting/translation work). That is, they were not refused with regards to the substantive merits of the request when considered against the factors we set out in the policy. Other requests included interpretation or translation work, printing costs, requests for additional solicitors and requests in relation to travel. As such, whilst it appears clear that equality considerations may be relevant, there are various types of ULE which will have no link to applicants' protected characteristics.

Age

Statistics

- **SLAB's data**

Age bands	Percentage of requests for ULE	Percentage of applicants for solemn legal aid (2024-25)	Percentage of applicants for summary legal aid (2024-25)
<=24	10.6%	20%	16%
25-34	37.9%	32%	30%
35-44	28.8%	29%	31%
45-54	9.1%	13%	15%
55-64	10.6%	5%	6%
65+	3.0%	1%	1%
Grand Total	**100%**	**100%**	**100%**

The table above shows that, compared to the profile of applicants for both solemn and summary legal aid, requests to incur ULE were slightly more likely to come from people in age bands 25-34, 55-64 and 65+. Most requests were in the 25-34 and 35-44 age bands, which is similar to the profile of solemn and summary applications. However, the low total volume of requests means it is difficult to draw any firm conclusions from the above as to whether there is meaningful variation in the number of requests by age.

Age bands	Granted	No decision	Refused	Grand Total
<=24	14.29%	42.86%	42.86%	100.00%
25-34	16.00%	12.00%	72.00%	100.00%
35-44	15.79%	21.05%	63.16%	100.00%
45-54	16.67%	0.00%	83.33%	100.00%
55-64	14.29%	0.00%	85.71%	100.00%
65+	0.00%	50.00%	50.00%	100.00%
Grand Total	**15.15%**	**16.67%**	**68.18%**	**100.00%**

Excluding the very low numbers in the 65+ age band, the grant rate for by the other age bands is very similar. Our view is that this suggests the policy is not having an unequal impact with regards to age.

In the absence of any broader information (for example, complaints or broader Operational insights) we do not believe there is evidence to suggest a need to change the policy.

- **Data relevant to the policy**

Evidence on different age categories

In relation to age, we are not aware of any obvious examples where unusually large work would be particularly relevant. Some special measures for younger applicants could conceivably require prior approval under this policy if particularly costly, but we found no such requests in the application data we reviewed.

In the UK, evidence suggests that the "peak age for criminal convictions is 21-25 for males and 26-30

for females."[3] We could infer from this that this age bracket is also more likely to be involved in criminal proceedings – and require legal aid – in the first place, though not necessarily that they are more or less likely to require ULE in their cases.

We are aware of external research on issues faced by children and other vulnerable people in engaging with legal proceedings and adaptations which can be made in order to facilitate their evidence being given in an appropriate way: for instance, research in relation to the 'Bairns Hoose' initiative suggests that special measures for child witnesses are in line with trauma-informed practice and can avoid re-traumatisation of children involved in legal proceedings, and are intended to be child-friendly in a way that supports the reliable giving and collecting of evidence.[4]

Some of these measures could potentially require prior approval for ULE if the cost was high enough; however, as noted above, in practice, such applications appear to be very infrequent if made at all.

Disability

Statistics

- **SLAB's data**

Applicant disability status	Percentage of requests for ULE
Disability	42.86%
No disability	57.14%
Grand Total	**100.00%**

It is important to note that for disability, the disclosure rate amongst the applications data is low, at around 42% of the total, which may obscure the true picture. That being said, the profile of applications for ULE shows what appears to be a fairly high level of requests from people with disabilities when compared to data from the 2022 Scottish Census data and a Family Resources Survey for 2022-23, which found that the percentage of Scottish people with a disability was between 21.4% and 27%. UK House of Commons research puts that number at 28% of the population in Scotland.

On the face of it, this appears to suggest this policy may be particularly relevant and important for people with disabilities: however, we address this point further after the following table.

Applicant disability status	Granted	No decision	Refused	Grand Total
Disability	8.33%	16.67%	75.00%	100.00%
No disability	25.00%	25.00%	50.00%	100.00%
Grand Total	**17.86%**	**21.43%**	**60.71%**	**100.00%**

[3] BBC Bitesize, Who commits crime? - Impact of crime on victims, offenders and their families - Higher Modern Studies Revision.

[4] Bairns Hoose, Support measures for child victims and witnesses in connection with giving evidence in criminal cases (2025).

The table above shows that the grant rate for disabled applicants requests for ULE is considerably lower than for non-disabled applicants. However, our view is this variation can be readily explained and does not reflect a discriminatory impact arising directly because of disability: in terms of the types of request being made, disabled applicants were more likely to make a request which should have been for an expert. This well may reflect input being (erroneously) sought in relation to their disabilities under this policy rather than under the expert policy: a common example being a psychiatric expert being sought to speak to whether an applicant might have a defence with regards to their mental health.

It is possible that disability may be relevant to a request to instruct a second solicitor (or solicitor advocate in the Sheriff court) in cases where the applicant's disability means that the case is particularly complex: however, such requests were not evident in practice amongst the data we considered.

In terms of scenarios in which disability might be relevant to ULE, one possibility would be where an applicant's disability means that the preparation and conduct of the case would be significantly more complex or difficult: in such a scenario, the solicitor may wish to instruct a further solicitor or solicitor advocate. Where the costs of doing so exceed £2,000, prior approval for ULE would be required.

- **Data relevant to the policy**

Evidence on different disabilities

- **Physical disabilities**

We note that amongst the data we considered, there was one request for a BSL interpreter where the anticipated costs for interpreting at trial were high: this request was granted.

- **Learning disabilities**

No specific evidence seen.

- **Mental health**

A reasonably large proportion of total requests related to solicitors requesting an expert witness to ascertain the applicant's mental state and functioning: these were uniformly refused, given approval should have been sought instead for an expert witness.

Sex

Statistics

- **SLAB's data**

Applicant sex	Percentage of requests for ULE
Female	19.23%
Male	63.46%
Prefer not to say	17.31%
Grand Total	**100.00%**

Overall, most ULE requests come from men, who also account for the majority of criminal legal aid applications and grants. Our view is that the gap between male and female applicants in how often they apply for approval for unusually large work reflects the profile of those involved in criminal proceedings, and therefore those applying for criminal legal aid, rather than any barriers to applications from women resulting from our policy position.

Applicant sex	Granted	No decision	Refused	Grand Total
Female	10.00%	0.00%	90.00%	100.00%
Male	21.21%	15.15%	63.64%	100.00%
Prefer not to say	11.11%	44.44%	44.44%	100.00%
Grand Total	**17.31%**	**17.31%**	**65.38%**	**100.00%**

The table above shows the respective grant rates by sex. Whilst there is a noticeable difference between men and women, it must be noted that the underlying differences in numbers are small. The low volume of applications means we are unable to test this data for statistical significance. However, in the absence of any other contextual evidence to suggest that there is a meaningful difference that arises because of sex (for instance, complaints), our view is that we cannot conclude that the policy has a discriminatory impact in relation to this protected characteristic.

- **Data relevant to the policy**

Evidence on women

No specific evidence seen.

Evidence on men

External evidence reflects the point in our data that a large majority of requests were from male applicants. UK Government data from 2023 assert that the overwhelming majority of those in the Criminal Justice System that year were men: "22% of individuals dealt with by the Criminal Justice System were female, and 78% were male."

Race

Statistics

- **SLAB's data (61% disclosure)**

Applicant race	Percentage of requests for ULE
White majority	31.71%
White minority	2.44%
Non-white ethnic minority	7.32%
Prefer not to say	58.54%
Grand Total	**100.00%**

The table above shows that for this protected characteristic; we have a very high rate of 'prefer not to

say' (as well as a large gap in disclosure). This accounts for each of the other categories – in particular White majority – appearing to be under-represented compared to population level figures: the Scottish Survey Core questions data for 2023 shows a combined total for the White majority groups being >85%, for instance. The high rate of prefer not to say makes it challenging to draw any conclusions about the profile of persons requesting approval for ULE. However, we are not at present sighted to any evidence suggesting that persons from particular groups face specific barriers to applying caused by our policy position.

For this protected characteristic, the numbers in individual cells are too low to report by grant rate. However, we do note that having considered the applications data, there were several requests for interpreters: many of these were refused, with implications for the grant rate by race. Applicants in, for example, the non-white minority group were more likely to request approval to undertake interpreting/translation, which generally does not require prior approval: these requests were refused, accounting for the variation in grant rate.

More broadly, it is not obvious that there are particular types of work which might be sought under the ambit of this policy in which an applicant's race is likely to be directly relevant. There were several requests for an expert to travel to another country to assess, for example, prison conditions, but again, these should have been requests for an expert witness.

- **Data relevant to the policy**

SLAB's most recent criminal applicant survey reported the following breakdown by ethnic origin (1):

Q17 What is your ethnic group? Base: 377	
Prefer not to say	1% (n=3)
A. WHITE	
Scottish	86% (n=323)
Other British	7% (n=26)
Irish	1% (n=2)
Gypsy/Traveller	-
Polish	1% (n=4)
Any other white ethnic group	2% (n=9)
B. MIXED OR MULTIPLE ETHNIC GROUPS	
Any mixed or multiple ethnic groups	0% (n=1)
C. ASIAN, ASIAN SCOTTISH OR ASIAN BRITISH	
Pakistani, Pakistani Scottish or Pakistani British	-
Indian, Indian Scottish or Indian British	-
Bangladeshi, Bangladeshi Scottish or Bangladeshi British	-
Chinese, Chinese Scottish or Chinese British	-
Other	0% (n=1)
D. AFRICAN, CARIBBEAN OR BLACK	
African, African Scottish or African British	1% (n=4)
Caribbean, Caribbean Scottish, or Caribbean British	-
Black, Black Scottish or Black British	0% (n=1)
Other	0% (n=1)
E. OTHER ETHNIC GROUP	
Arab	0% (n=1)
Other	-

Evidence on different ethnicities

No specific evidence found.

Evidence on people whose first language is not English

As noted above, amongst the requests for ULE were several requests for interpreting or translation: indeed, these formed the second largest thematic grouping. There are some very limited circumstances in which prior approval for an interpreter or translation may be required where the total spend is beyond the £2,000 threshold but in general terms, it is crucial to note that interpreting and translation does not require prior approval at all. This accounts for the high rate of refusals for this type of work, and therefore for some groups within this protected characteristic.

Gender reassignment

Statistics

- **SLAB's data**

No specific evidence available for this protected characteristic.

- **Data relevant to the policy**

Evidence on trans people

No specific evidence found.

Sexual orientation

Statistics

- **SLAB's data**

No specific evidence available for this protected characteristic.

- **Data relevant to the policy**

Evidence on gay men

No specific evidence found.

Evidence on gay women/lesbians

No specific evidence found.

Evidence on bisexual people

No specific evidence found.

Religion or belief

Statistics

- **SLAB's data**

No specific evidence available for this protected characteristic.

- **Data relevant to the policy**

Evidence on different religions

No specific evidence found.

Pregnancy or maternity

Statistics

- **SLAB's data**

No specific evidence available for this protected characteristic.

- **Data relevant to the policy**

Evidence on pregnancy and maternity

No specific evidence found.

Marriage/civil partnership (only applies to policies related to employment)

Statistics

- **SLAB's data**

This protected characteristic is not relevant for the purposes of this EqIA.

- **Data relevant to the policy**

Evidence on marriage and civil partnership

N/A.

Care Experienced

Statistics

- **SLAB's data**

SLAB's most recent criminal applicant survey reported the following breakdown of applicants by care status.

Q19 Are you currently, or have you ever been, 'looked after' by a Local Authority? By this we mean: subject to a supervision order with no condition of residence; with foster carers or prospective adopters, in a residential care home, in a residential school or a secure unit. **Which of the following applies to you?** Base: 340	
Currently 'looked after' by a Local Authority	8% (n=28)
Have previously been 'looked after' by a Local Authority	13% (n=45)
Never been 'looked after' by a Local Authority	68% (n=232)
Prefer not to say	10% (n=35)

[5]

Applicant experience of care? (61% disclosure)	**Percentage of requests for ULE**
Yes	0.00%
No	12.20%
Prefer not to say	87.80%
Grand Total	**100.00%**

[5] SLAB criminal applicant survey 2018-19.

In comparison to the (older) data seen in the criminal applicant survey above, there is a much higher rate of prefer not to say and considerably lower rates of applicants indicating they had experience of care. This is also in the context of a large gaps in disclosure of this characteristic in the first place.

Given the low volumes of applications in this area, it is difficult to draw any robust conclusions about whether people with experience of care are genuinely under-represented amongst those applying for unusually large work, and if so, whether that results from the policy position adopted. In the absence of other evidence that suggests a barrier here (for example, complaints), our view is that we cannot conclude the policy position is discriminatory in its impacts.

The numbers involved are too low to allow for reporting and meaningful analysis of grant rate.

- **Data relevant to the policy**

Evidence on care experienced people

Research by the Howard League found that "*looked-after children are disproportionately criminalised compared to other children, particularly those living in residential care [...] They are less likely to receive support from family members or another trusted adult at the police station, which can adversely affect them.*"[6]

This could suggest that people with experience of care are particularly likely to be involved in criminal proceedings, though not necessarily to make requests for ULE.

2.2. Using the information above and your knowledge of the policy/practice/process/service, summarise your overall assessment of how important and relevant it is likely to be for equality groups.

The scope of work which could potentially be requested under this policy is very wide: hypothetically, work which has a bearing on an applicant's protected characteristics could be within scope. In practice, we saw few requests in which a direct link could be drawn, and these included some requests in relation to interpreters, for instance. There is potential relevance and importance for at least some protected characteristic groups, though the evidence suggests that in a large majority of requests, the applicant's protected characteristics are likely to have no relevance at all.

In assessing the impact of this policy – and in particular, reviewing the grant rates by protected characteristics where data is available – we have noted a number of data points which on the face of things, might suggests problematic impacts arising from the policy position: for example, the much lower grant rate for white minority applicants and for disabled applicants. Our assessment is that these differences do not reflect problematic equalities impacts arising from the specific policy position set out, but instead reflect misunderstandings on the part of solicitors as to when prior approval is required, which happen to be more prevalent for these groups given the types of work for which approval is sought (for instance, disabled applicants being more likely to request an expert in relation to their mental health with regards to a defence, which will be refused as the wrong type of approval).

[6] Howard League for Penal Reform (2019), Representing looked-after children at the police station: a step-by-step guide for lawyers, at 1.

2.3. Outcome of Step 2 and next steps. Select the outcome below to inform the next stage of the EqIA process.

Please select your decision: Proceed to Step 3 - complete full EqIA.

Please outline the reasoning behind your decision:
Given the assessment above with regards to the potential relevance of this policy to equality groups, a full assessment is required.

Step 3: Stakeholder involvement and consultation

3.1. Do you/did you have any consultation or involvement planned for this policy/practice/process/service?

No.

3.2. List all the stakeholder groups that you will talk to about this policy/practice/process/service.

N/A.

3.3. What did you learn from the consultation/involvement?

N/A.

Step 4: Impact on equality groups and steps to address these

4.1. Does the policy/practice/process/service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

Cross-cutting evidence

Our view is that outcomes of this policy will primarily be driven by legal and practical issues at play in the case, rather than by the applicant's protected characteristics in and of themselves, other than in very limited circumstances.

It is important to note that our decision-making in relation to any specific request to incur ULE is driven by considering how far such work could advance the case and whether due regard to economy has been demonstrated with regards to the likely costs. Our assessment is that an applicant's protected characteristics will only be directly relevant to such considerations in rare circumstances.

SLAB has a wide degree of discretion available in terms of its policy on prior approval for ULE. The factors that appear in the agreed policy are broadly framed. Our assessment is that they are framed in such a way that where relevance to the factors is demonstrated issues relating to any of the protected characteristics with regards to possible need to undertake ULE can be considered. In incorporating such a degree of flexibility, our view is that the policy position advances equality of opportunity.

Age

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

As set out under section 2, there did not appear to be any obviously significant relationship between age and the grant rate for unusually large work, nor does the policy appear to be particularly relevant for any specific age bands. We are not aware of evidence that suggests a potentially discriminatory impact on age because of our policy position, and as such, have identified no impact that requires to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Disability

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

There are some forms of ULE work in which there could be a potentially direct link between an applicant's disability and a request being made: in particular, (some) requests for multiple solicitors, though in practice this appears to be very rare.

We noted that the grant rate for people with disabilities appears significantly lower than that for people without disabilities. However, we have explained that this is the result of misunderstandings about the scope of the policy, rather than any substantive impact of the policy position on people with disabilities.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Sex

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We did not see any evidence that the access to approval for ULE as significantly more challenging for either men or women, and nor are we currently aware of any specific instances in which our policy has resulted in a problematic barrier because of their protected characteristics.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Race

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We set out the limited range of evidence available to us in relation to race in section 2, which included what appear to be a sizeable degree of variation in the grant rate. As explained under section 2, our assessment is that the variation in grant rate does not reflect problematic impacts arising because of the policy position but instead reflects patterns in the types of work sought and the circumstances in which prior approval is actually required. Overall, we are not currently aware of any evidence that shows specific barriers for any of the groups within this protected characteristic arising because of our policy position.

It is important to bear in mind that interpreters are not *generally* subject to our policy on ULE; approval is only required where the proposed expenditure exceeds the threshold of £2,000.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Gender reassignment

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We did not find any evidence that indicated a specific relevance of ULE with regards to this protected characteristic, or which suggests that applicants are more or less likely to seek and to be granted approval to incur ULE depending on their gender reassignment status. However, nor are we aware of any current issues. There are no known adverse impacts to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Sexual orientation

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We did not find any evidence that indicated a specific relevance of ULE with regards to applicants' sexual orientation, or which suggests that applicants from sexual orientations are more or less likely to seek and to be granted approval to incur ULE. However, nor are we aware of any current issues. There are no known adverse impacts to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into

account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Religion or Belief

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We did not find any evidence that indicated a specific relevance of ULE with regards to applicants' religion or belief, or which suggests that applicants from religious or belief backgrounds are more or less likely to seek and to be granted approval to incur ULE. However, nor are we aware of any current issues. There are no known adverse impacts to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Pregnancy & Maternity

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

We did not find any evidence that indicated a specific relevance of ULE with regards to applicants' pregnancy or maternity status, or which suggests that, for example, applicants who are pregnant are more or less likely to seek and to be granted (or refused) approval to incur ULE. However, nor are we aware of any current issues. There are no known adverse impacts to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

Marriage & Civil Partnership (only applies to policies related to employment)

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: No impact.

This protected characteristic is not relevant for the purposes of this assessment.

Care experience

Potential for discrimination: No impact.
Potential for developing good relations: No impact.
Potential to advance equality: Positive impact(s).

As set out under step 2, whilst we are aware of evidence that shows that people with experience of care are over-represented in the criminal justice system, we found no specific evidence or data that allows us to see a clear linkage between applicants with this protected characteristics and particular forms of requests for ULE. In broad terms, we are not aware of any current issues with regards to how

this policy operates in relation to this protected characteristic. There are no known adverse impacts to be mitigated.

As noted above, in the 'cross cutting' section, our assessment is that the factors set out within the policy are broad enough to allow for issues relating to any protected characteristic to be taken into account where relevance can be demonstrated; and that this means that the policy has a positive impact with regards to equality of opportunity.

4.2. Which actions have you taken as part of this assessment?

Please select the outcome of the assessment: Confirm that the policy/practice/process/service described in section 1.1 was robust.

Please explain the changes that have been made:
Given the assessment above, our view is that no changes are required to this policy.

Step 5: Discuss and review the assessment with decision makers and governance structures

5.1. Record details of the groups you report to about this policy/practice/process/service and impact assessment. Include the date you presented progress to each group and an extract from the minutes to reflect the discussion.

Discussions with lead Operational staff, March 2026, followed by consideration by senior leadership staff at GALA Review meeting, on 16 March 2026.

Step 6: Post-implementation actions and monitoring impact

6.1. Record any ongoing actions below

Ongoing monitoring will take place through the analysis of requests, grants and refusals broken down by protected characteristic in line with section 6.2. No additional policy actions have been identified at this stage.

6.2. Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups

Measure	Lead department or individual	Reporting (where and frequency)
Analysis of requests, grants and refusals for ULE by protected characteristic and, where feasible, by category of expenditure requested (for example interpretation/translation, travel, additional solicitors).	AMI (data extraction) with Policy (analysis).	Once per review cycle to Head of Criminal Legal Assistance.

6.3. EqIA review date

26/02/2029.

Step 7: Assessment sign off and approval

Director/SRO sign off: 26/02/2026.
Chief Executive approval: 26/02/2026.

All full EqIAs must be published on SLAB's website as early as possible after the decision is made to implement the policy/practice/process/service.