

Changing our requirements on first-tier complaints – supplementary consultation

July 2026

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About this consultation

In 2025 we consulted on proposals to change our requirements on first-tier complaints. Following that consultation, we are going ahead with those changes, as set out in our [consultation response](#). This consultation does not revisit our 2025 proposals.

Since then, we have been carefully considering the most up-to-date evidence and have continued to engage with stakeholders. We have also been in discussion with our oversight regulator, the Legal Services Board (LSB) about what is needed to be in line with its Section 112 [Statutory Requirements](#) for approved regulators.

As a result, we are now seeking your views on:

- two new, targeted requirements on how solicitors and firms communicate with clients when a complaint is raised. These are that:
 - when a complaint is first notified, clients are provided with a timeline for resolution of their complaint
 - clients are given regular updates on the progress of their complaint
- our intention to publish a Complaints Handling Requirements Statement, so that firms have a clear indication in one place about what they must do in this important area
- the areas we plan to cover in our new complaints handling guidance.

We have developed this package of proposals to build on what we consulted on in 2025. After reflecting on this work, we think that we need to strengthen our requirements around communicating with clients when they make a complaint. We also think it is important that solicitors and firms know clearly what the specific complaints handling requirements are. To help with this we have compiled a statement that draws all the requirements together, adding detail from our Standards and Regulations and the LSB Section 112 Requirements.

Our Complaints Handling Requirements Statement will set out the mandatory requirements, but we think there is still an important role for guidance. Many respondents to our 2025 consultation, as well as our thematic review, agreed that guidance would be helpful. It will give examples of how firms can move beyond the minimum standards and strive to deliver best practice.

We want to be very clear to solicitors and firms about what they need to do to effectively handle complaints and meet our requirements in this area. And what could happen if they do not. We want to support them to get it right and improve outcomes for consumers. Better complaints handling brings benefits for firms and their clients and builds public trust and confidence in legal services.

This consultation runs from 3 July until 1 September 2026. After this consultation closes, we will collate and analyse all the responses. We will then decide what proposals we need to take forward and will publish our consultation response to set out our planned next steps.

How to respond

Online questionnaire

Our online consultation questionnaire is a convenient, flexible way to respond. You can save a partial response online and complete it later. You can download a copy of your response before you submit it.

[Start your online response now.](#)

Reasonable adjustment requests and questions

We offer reasonable adjustments. [Read our policy to find out more.](#)

[Contact us](#) if you need to respond to this consultation using a different format or if you have any questions about the consultation.

Publishing responses

We will publish and attribute your response unless you request otherwise.

Background to consultation

Legal services underpin everything, from family life to business growth. People rely on them to navigate major life events, uphold their rights and resolve disputes. Businesses depend on them to hire, invest with confidence and thrive.

The Solicitors Regulation Authority is the largest regulator of legal services in England and Wales, covering around 90 per cent of the market. We regulate more than 200,000 solicitors and around 9,000 law firms.

Our mission is to drive confidence and trust in legal services. Today, two-thirds of the public say they have that confidence. Our responsibility is to protect and further build that trust.

For consumers, the way solicitors and firms deal with complaints is a key indicator of service quality and of whether they can have trust and confidence in their provider. For solicitors and firms, complaints are an opportunity to identify areas for improvement and ways to deliver more effectively for clients.

When a consumer is dissatisfied with the way their work has been handled, they have the right to an accessible, transparent route to complain so that, where appropriate, things will be put right. They can also expect that, if they remain unhappy after trying to resolve things with the firm, they have somewhere to escalate the complaint to for an independent review.

When clients are dissatisfied with the service of a firm, they can raise complaints directly with the firm. These are known as 'first-tier complaints'. Law firms have eight weeks after receiving a first-tier complaint to provide their final written response. If the firm is unable to resolve the complaint to the satisfaction of the client, they can then contact the Legal Ombudsman (LeO). This is known as a 'second-tier complaint'.

There is a different process for when consumers are concerned about a solicitor or firm's behaviour or conduct. When this happens, they need to report them to us to investigate whether they have breached our rules.

There are robust mechanisms for assuring standards in first-tier complaints for SRA regulated firms and individuals within our rules framework. Solicitors have a duty to provide a good standard of service, as we set out in our [Principles](#). We have a number of requirements across our rules that set out our expectations about service standards. Our Codes of Conduct and Transparency Rules set specific requirements in relation to complaints handling. We also provide guidance for those we regulate to help them meet our requirements on publishing complaints procedures and the information this should include.

In our 2025 consultation, we presented strong evidence for the changes we proposed. This included that:

- our compliance monitoring and [evaluation of our Transparency Rules](#) identified that firms are not always publishing their complaints procedures as required or are omitting or including incorrect information when signposting to LeO
- our [thematic review of first-tier complaints handling](#) found variation in how firms identified, defined and handled complaints. While there were a number of good practice areas, we also found areas where improvements were needed. Examples of poor practice included solicitors using defensive and dismissive language in their communications when someone complained and them not always making complaints information available as required
- the Legal Services Consumer Panel annual [Tracker Survey](#) has consistently found large numbers of consumers that are uncertain about how to complain or say they would not know how to if they were dissatisfied with the legal services they used. The [2025 survey](#) found:
 - approximately half of consumers (53 per cent reported that they would know how to go about making a complaint about the legal services they used if they were dissatisfied
 - while 26 per cent were uncertain and 21 per cent said they would not know how to do this
 - the proportion of all answers remains in line with previous years.

There is recent further evidence that the numbers of complaints across first and second-tier are continuing to rise and that improvements are still needed in how they are handled.

Firms are receiving an increasing number of first-tier complaints each year. In 2025, they reported receiving more 41,000 complaints at first-tier. This is the highest it has been since we started to collect the data in 2012, and an 11 per cent increase since 2024. There has also been a slight decrease in the numbers that firms report resolving at first-tier, from 82 per cent in 2024 to 80 per cent in 2025.

In the first three quarters of 2025-26, LeO found that the [complaints handling had been poor](#) in 46 per cent of the complaints it investigated. LeO has stated that the poor complaints handling issues include inconsistent or complex complaints processes or legal service providers having defensive attitudes when handling complaints.

LeO is also [reporting](#) that demand for its service resolving second-tier complaints is rising at pace. Following an almost 30 per cent year-on-year rise in 2025-26, LeO forecasts receiving 17,675 new complaints in 2026-27, a 174 per cent increase since 2019-20. On 10 June, it launched a [consultation](#) on significant reforms to help meet this unprecedented demand, involving changes to its Scheme Rules, case fees and publication of ombudsman decisions. It proposes a revised model for charging differentiated case fees, alongside additional charges for providers who have not provided a final response as part of the first-tier complaints process. The approach is designed to incentivise earlier resolution and better complaint handling.

We support LeO's work to develop resources that help prevent complaints arising, including its Model Complaints Resolution Procedure, which we included in our 2025 consultation. We also want to make sure the solicitors and firms we regulate improve first-tier complaints handling so consumers only need to escalate complaints to LeO where necessary. Together, our 2025 proposals, the additional proposals we are now consulting on, and the supporting resources we are developing are intended to strengthen our regulatory framework and raise standards in complaints handling.

We have reviewed this evidence and identified areas where we need to further strengthen our requirements, and to be clearer to those we regulate about our expectations.

In 2025, we sought views on proposals to:

- make changes to when complaints information must be provided to a client
- require complaints information to be clear, accessible and in a prominent place on firms' websites, where they have one (and made available on request when they don't have a website)
- include the Legal Services Board's (LSB) definition of a complaint in our glossary of defined terms
- develop new guidance to help those we regulate to understand our new requirements and how to meet our rules and combine this with our existing guidance on publishing complaints procedures.

We also sought views on two further areas that we were exploring as part of our work on first-tier complaints. These were:

- collecting and publishing additional complaints data; and
- co-development of a model complaints resolution procedure.

In our [consultation response](#), we set out our final positions on each of these proposals. These are unchanged and we still intend to proceed as planned.

We are now building on these proposals and are asking for views on two additional new requirements. We are also asking for views on our draft Complaints Handling Requirements Statement and the areas we plan to cover in guidance.

What additional changes are we considering?

We are now seeking views on new proposals to further strengthen our requirements by making changes to how solicitors and firms communicate with clients when they have raised a complaint. These are to require that:

- when a complaint is first notified, clients are provided with a timeline for resolution of their complaint
- clients are given regular updates on the progress of their complaint.

We are inviting feedback on our draft new Complaints Handling Requirements Statement. This Statement will help solicitors and firms know clearly what our complaints handling requirements are by drawing them all together alongside detail from our rules and the LSB's Section 112 Requirements.

We are also asking for views on the areas we plan to cover in our new complaints handling guidance.

We want to be very clear to those we regulate what they must do to effectively handle complaints and meet our requirements in this area – and what could happen if they do not.

Our proposed new requirements

Communication is key to ensuring confidence in complaints processes.

While our existing framework requires that clients are notified about the eight-week timescale for responding to complaints before they can be escalated to LeO, we believe this should be re-stated at the point which someone makes a complaint. This will provide transparency to clients about the process and may assist in managing their expectations.

We also believe that providing regular updates when someone has complained will demonstrate proactivity by the solicitor or firm in resolving the complaint. This will provide important reassurance to the client that the complaint is being dealt with. These updates should include if there is a delay or if more information is required before further progress can be made.

[Research for the LSB](#) with consumers found that they believed it important that providers set out a timeframe for dealing with a complaint. It also found that there was an expectation from consumers that they would receive updates about how their complaint was progressing against a stated timeline or, if a set timeframe was not feasible, at regular, agreed intervals. If an update was likely to be missed for any reason, then participants believed the client should receive information in advance about why this was the case, alongside a revised timeline. That said, some participants noted that some clients might only want updates when there is something substantial to say but others might want communications to reassure

them that they have not been forgotten and to give confidence that things are happening in the background.

Respondents also said that asking clients about preferences in terms of frequency of updates could help personalise the process and actually save providers money as they would not have to provide as frequent updates to some clients. The use of technology was also mentioned as a way of keeping clients updated. Some thought the process could be partly automated (such as sending short messages with updates if there is little to report on), as long as the process as a whole remains personalised. The [LSCP's Tracker Survey](#) also found that legal service users' most preferred method for progress updates (on service delivery) was for them to be via email.

The consumers we engaged with through our [stakeholder engagement programme](#) raised the importance of communication with their solicitor. One participant who had been through both first and second-tier complaints processes with her solicitor said that she would have preferred to receive the complaints information, particularly about time limits, more frequently. The consumer organisations we spoke to were supportive of complaints information being provided more frequently. They said the individuals they support, who are often vulnerable by their characteristics or circumstances, can struggle to retain information.

Since our last consultation, we have had additional discussions with consumers and consumer organisations around good practice in customer service. During these discussions, consumers flagged that clarity of information, including realistic timelines, was important to them.

We are proposing to add a new requirement as paragraph 8.3.1 (a) and 8.3.1 (b) into our Code of Conduct for Solicitors, RELs, RFLs and RSLs. This will also apply to firms under section 7.1 (c) of our Code of Conduct for Firms, to require that, when a complaint is first notified, clients are provided with a timeline for resolution of their complaint and that clients are given regular updates on the progress of their complaint.

You can read the wording for the new proposed requirements in full at [Annex 1](#).

Questions

Q1. Do you agree with our proposal to add a new requirement that, when a complaint is first notified, clients are provided with a timeline for resolution of their complaint? Please give reasons for your answer.

Q2. Do you agree with our proposal to add a new requirement that clients are given regular updates on the progress of their complaint? Please give reasons for your answer.

Draft Complaints Handling Requirements Statement

At Annex 2, we have included a draft of our proposed [Complaints Handling Requirements Statement](#).

We recognise that our requirements for complaints handling may be challenging to navigate because they sit within a number of our rules (our Code of Conduct for individuals, Code of Conduct for firms and Transparency Rules). We also have to be clear how the LSB's s112 Requirements for approved regulators are met by our rules.

Through our Complaints Handling Requirements Statement, we aim to help solicitors and firms to understand their obligations for complaints handling and how to comply with them by drawing them all together. It is structured by the themes of:

- definition of a complaint
- consumer confidence
- accessibility
- provision of information
- communication
- learning and improvement
- enforcement.

It includes reference to the relevant sections of the SRA's rules and the applicable LSB Section 112 Requirements in this area, that align with SRA rules.

We want to be very clear to those we regulate what they need to do to effectively handle complaints and meet our requirements in this area – and what could happen if they do not.

The final statement will be published in our [Standards and Regulations section](#).

Q3. What are your views on our draft Complaints Handling Requirements Statement?

Guidance

While the Complaints Handling Requirements Statement will set out the mandatory requirements, we think there is still an important role for guidance. Many respondents to our 2025 consultation, as well as our thematic review for first-tier complaints handling, agreed that guidance would be helpful. It will give examples of how firms can move beyond the minimum standards and strive to deliver best practice.

As set out in our 2025 consultation, the guidance we have been developing has been shaped by our thematic review, feedback gathered in our last consultation exercise and engagement with firms through our Relationship Management programme. We have had helpful input from LeO and The Law Society. We also included feedback and resources shared with us from our stakeholder engagement programme, which included engagement with solicitors, consumers and consumer representative organisations, including those that support people who may be vulnerable by their circumstances or situation.

We anticipate the guidance will cover the following areas:

- identifying complaints
- what information to give clients and when – including in complex or long-running cases
- responding to and resolving complaints – including complying with remedies, and handling complaints where the complainant has used artificial intelligence (AI) in drafting
- communication – including sending acknowledgements, communicating the outcome of a complaint and informing clients of third-party delays
- accessibility – including more information on and examples of prominence, the use of clear, plain, appropriate language and reasonable adjustments
- supporting vulnerable clients – including signposting to SRA resources, such as our guidance on meeting the needs of vulnerable people
- learning and improvement – how to learn from the complaints to prevent issues occurring again
- managing difficult situations in complaints handling – including how to support staff.
- support for solicitors – acknowledging that receiving complaints can have an impact on solicitors and signposting where they can go for support
- external resources – signposting to other resources available such as those from LeO and The Law Society, as well as from organisations that support with accessibility.

Q4. Are there any other areas you would find helpful for the guidance to cover?

Draft Regulatory Impact and Equality Impact Assessment

We have produced a draft Regulatory Impact and Equality Impact Assessment on reviewing our requirements for first-tier complaints at Annex 3.

This builds on the [Regulatory Impact Assessment](#) and the [Equality Impact Assessment](#) we published last year following our consultation.

Q5. Do you have any comments on the regulatory impact of our proposals on first-tier complaints? Please include any supporting evidence where you can.

Q6. Do you have any comments on our draft equality impact assessment? Please include any supporting evidence where you can.

Q7. Do you have any further comments relating to our work on first-tier complaints that you would like to share with us?

Our questions in full

We are keen to hear your views on our changes to our requirements on first-tier complaints. An uninterrupted list of our questions is below.

Q1. Do you agree with our proposal to add a new requirement that, when a complaint is first notified, clients are provided with a timeline for resolution of their complaint? Please give reasons for your answer.

Q2. Do you agree with our proposal to add a new requirement that clients are given regular updates on the progress of their complaint? Please give reasons for your answer.

Q3. What are your views on our draft Complaints Handling Requirements Statement?

Q4. Are there any other areas you would find helpful for the guidance to cover?

Q5. Do you have any comments on the regulatory impact of our proposals on first-tier complaints? Please include any supporting evidence where you can.

Q6. Do you have any comments on our draft equality impact assessment? Please include any supporting evidence where you can.

Q7. Do you have any further comments relating to our work on first-tier complaints that you would like to share with us?