

A thematic review of first-tier complaints handling

14 October 2025

Executive summary

Background

Solicitors have a duty to provide a good standard of service, as set out in our [Principles](https://www.sra.org.uk/solicitors/standards-regulations/principles/1) [\[https://www.sra.org.uk/solicitors/standards-regulations/principles/1\]](https://www.sra.org.uk/solicitors/standards-regulations/principles/1).

How solicitors handle complaints is a key part of providing good service. Recognising areas of improvements is an effective way to raise service standards and improve satisfaction for clients. This will lead to increased trust and confidence in solicitors and firms.

When clients are dissatisfied with a firm's service, they can raise complaints directly with the firm. These are known as 'first-tier complaints'. Law firms then have eight weeks from the date they receive a first-tier complaint to provide their final written response. If the firm is unable to resolve the complaint to the client's satisfaction, clients can then contact the [Legal Ombudsman](https://www.legalombudsman.org.uk/media/ce4p0hjh/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) [\[https://www.legalombudsman.org.uk/media/ce4p0hjh/large-regulator-chief-executive-letter-annual-complaints-v10.pdf\]](https://www.legalombudsman.org.uk/media/ce4p0hjh/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) (LeO). This is known as a 'second-tier complaint'.

A different process applies when consumers are concerned about the behaviour or conduct of a solicitor or firm. In these cases, consumers need to report them to us to investigate whether they have breached our rules.

We have a number of requirements across our Standards and Regulations that set our expectations about service standards and complaints handling at a first-tier complaint and escalation to a second-tier complaint. These include that the firms and individuals we regulate must have a complaints procedure in place, and deal with complaints promptly, fairly and free of charge.

We know that a large number of those we regulate meet these requirements. However, evidence from our own compliance monitoring and from stakeholders such as LeO shows that there are areas where improvements are needed. The Legal Services Consumer Panel has found each year in its [Tracker Survey](https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2025/07/25.07.07-How-consumers-are-using-legal-services-report-2025.pdf) [\[https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2025/07/25.07.07-How-consumers-are-using-legal-services-report-2025.pdf\]](https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2025/07/25.07.07-How-consumers-are-using-legal-services-report-2025.pdf) that a large number of consumers do not know how to complain if they are dissatisfied. Some of these consumers said they would be reluctant to complain directly to their law firm for reasons such as not

trusting the firm to deal with it properly or concerns about how their provider might react. We also know that those who may be vulnerable through their characteristics or situation can face additional barriers to complaining.

We set out in our [2024/25 Business Plan](https://www.sra.org.uk/sra/corporate-strategy/business-plans/business-plan/business-plan-2024-25/) that we would review and update our requirements for first-tier complaints. In May 2024, the Legal Services Board (LSB) issued new [complaints handling requirements guidance](https://legalservicesboard.org.uk/wp-content/uploads/2024/05/s112-Requirements.pdf) and a [Statement of Policy](https://legalservicesboard.org.uk/wp-content/uploads/2024/05/First-Tier-Complaints-Policy-statement.pdf), with a requirement for us to implement by November 2025.

To help build on the evidence we have gathered and inform our approach to the LSB requirements we undertook a thematic review and survey.

What we did

Between January and March 2025, we visited 25 firms and reviewed 50 complaint files. At each visit, we met with the person with overall responsibility for complaints and explored their experiences of dealing with them. We also sent a survey to 750 firms of various sizes and specialisms working in England and Wales. Firms working in areas with high complaint volumes such as residential conveyancing, personal injury or probate were over-represented in the sample relative to actual market share. The analysis was then weighted so that the results are representative of all firms.

The key areas we explored in both the survey and thematic visits were:

- Recognising a complaint: how firms identify and define first-tier complaints;
- Dealing with complaints: providing information to clients, timescales and additional support provided to vulnerable clients; and
- Insights from complaints: monitoring complaints and using learning to implement change.

The key findings for each of these areas are set out below.

To note: the thematic review and survey were undertaken between January and March 2025 so relate to the Standards and Regulations as they were at that time. Our next steps and proposed changes to our requirements are set out in our [consultation response](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftp/).

Key findings



Recognising a complaint: how firms identify and define first-tier complaints

- Firms define complaints in a variety of ways. Only one interviewee said their firm used the LSB's full definition of a complaint¹. Eleven interviewees said a complaint was often more of a judgement call and did not use a single definition. This variation was reflected in the survey responses and was an area where firms asked for further guidance.

Dealing with complaints: providing information to clients and timescales for responding

- All interviewees and most survey respondents (95 per cent) told us that clients were notified in writing at the outset of their legal matter about how to complain (as required by our Standards and Regulations).
- Most firms in both our interviews and survey told us they provide a final response within eight weeks. However in 30 per cent of the 50 complaint files we reviewed the response exceeded eight weeks.
- There was variation in how prominently complaints procedures were presented on a firm's website and they were not always easy to find.
- The length, quality and tone of the complaint responses we reviewed varied significantly. Some used defensive, dismissive or legalistic language. Better practice included the use of accessible language and making sure the concerns raised by the client had all been addressed.

Supporting vulnerable clients

- Approaches to vulnerability varied across those we interviewed. Some firms had dedicated policies and training (not always complaints specific). Other firms had not considered it at all or focused on making adjustments for people with physical disabilities, such as providing documents in large print.
- When asked how they support vulnerable clients, survey respondents shared a range of examples such as offering in-person meetings (72 per cent), providing clear explanations that are easy to understand (62 per cent), or allowing clients additional time to reflect on a firm's response or decision (57 per cent). A few also stated that they offered home visits, where appropriate.
- All interviewees were willing to accept complaints on behalf of clients, for example from family members or friends, so long as the client had given their consent. This approach can be particularly helpful where a person may be vulnerable because of their characteristics or circumstances.



- Supporting vulnerable clients is an area where survey respondents asked for support and guidance.

Insights from complaints: monitoring complaints and using learning to implement change

- Interviewees told us that good complaints handling can create business benefits. They recognised that clients who were satisfied with the firm's handling of the complaint were more likely to re-instruct them in the future or recommend them to others.
- Twenty-two interviewees said complaints were monitored at a firm-wide level. They told us this data was used to identify trends and help improve the delivery of legal services.
- Some interviewees told us they used insights from complaints to change how their firm delivered services. For example, introducing a live case tracker which enabled clients to monitor the progress of their matter.
- Survey respondents said that they used a range of resources relating to complaints, including SRA resources/guidance (70 per cent) and LeO resources/guidance (66 per cent). Some respondents stated that there needed to be further support given to solicitors handling complaints, as it can be a stressful process.

Good practice

We have set out key examples of good and poor practice, as well as illustrative case studies in the main report. We have highlighted some good practice examples below:

- If you are not sure whether someone wants to make a complaint, ask them and signpost to your complaints procedure.
- Offer clients several ways to make a complaint, so they can then make it in a way which best suits them.
- Consider whether a client needs additional help and support throughout the complaints procedure and offer adjustments where appropriate.
- Clearly set out in your complaints procedure information about the stages and timescales involved.
- Make sure that client concerns are taken seriously, and the tone of responses is accessible and appropriate – not defensive or legalistic.
- Review complaint responses to check all required LeO information is included and up to date.
- Signpost clients to external resources such as LeO template letters.
- Provide regular training and support to staff who handle complaints, including dealing with difficult situations.
- Review your complaints procedure regularly.
- Use complaints information to inform learning and development activities and improve processes.

Next steps

The thematic review and survey have provided us with a rich evidence base for our policymaking and informing our approach to the LSB requirements for first-tier complaints.

We identified areas in our current regulatory framework where we could strengthen our requirements, be clearer in our expectations and in supporting those we regulate to meet them. Between 30 May and 1 August 2025, we consulted on proposals for doing this and have published our [consultation response and next steps](#) [<https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-etc/>] alongside this report.

To note: The data used in our consultation was correct at the time of publication. We accepted some late responses to the survey, so the percentages included could vary by +/- 1 per cent because of this.

[Download: A thematic review of first-tier complaints handling \(PDF 30 pages, 432KB\)](#) [<https://www.sra.org.uk/globalassets/documents/sra/research/thematic-review-of-first-tier-complaints-handling.pdf>]

[Footnotes](#)

1. An oral or written expression of dissatisfaction, which alleges that the complainant has suffered (or may suffer) financial loss, distress, inconvenience, or other detriment.