

SRA response

Legal Services Board Statement of Policy: first-tier complaints

Published on 17 November 2025

Executive summary

The Solicitors Regulation Authority (SRA) is the largest regulator of legal services in England and Wales, covering around 90% 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. We are focused on the issues that can transform legal services, making sure the profession delivers the high standard of service that the public deserves.

Our role includes setting the standards required from solicitors and firms, acting if things go wrong and enforcing compliance with these standards. We also work towards improving experiences and outcomes for the public.

We want consumers to be satisfied with the service they receive from those we regulate. The Legal Services Consumer Panel's (LSCP) [Tracker Survey](https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2024/07/24.07.15-How-consumers-are-using-legal-services-report-FINAL.pdf) found that satisfaction with the service provided by legal service providers was at its highest in 2024, at 87 per cent. However, we have evidence from our compliance monitoring and from our stakeholders that wider improvements in complaints handling are needed to raise standards and improve outcomes for consumers.

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

In May 2024, the Legal Services Board (LSB) issued [Requirements, Guidance and a Statement of Policy to regulators](https://legalservicesboard.org.uk/our-work/lrb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules) to improve the way in which first-tier complaints (complaints made directly to a legal service provider) are handled.

There are existing mechanisms for assuring standards in first-tier complaints for SRA regulated firms and individuals within our [Standards and Regulations framework](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/), including that solicitors and firms should have a complaints procedure, publish it on their website and deal with complaints promptly, fairly and free of charge.

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 and undertake a programme of work in this area.

We also have evidence from our compliance monitoring and from our stakeholders such as the [Legal Ombudsman](https://www.legalombudsman.org.uk/media/ce4p0hgw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) [https://www.legalombudsman.org.uk/media/ce4p0hgw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf] (LeO) and [LSCP](https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done) [https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done], that wider improvements in complaints handling are needed to raise standards and improve outcomes for consumers.

With this in mind, and informed by our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/], between May and August 2025 we [consulted](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-rtc/?s=c) [https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-rtc/?s=c] on proposals to strengthen our rules.

Having analysed and carefully considered responses to the consultation and feedback from our [stakeholder engagement](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/rtc---summary-of-feedback-from-engagement-programme.pdf) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/rtc---summary-of-feedback-from-engagement-programme.pdf], we submitted our [application](https://legalservicesboard.org.uk/wp-content/uploads/2025/10/SRA-application-to-LSB-changes-to-first-tier-complaints-regulatory-arrangements-14-10-2025.pdf) [https://legalservicesboard.org.uk/wp-content/uploads/2025/10/SRA-application-to-LSB-changes-to-first-tier-complaints-regulatory-arrangements-14-10-2025.pdf] to the LSB for formal approval of regulatory changes on 14 October 2025.

We are responding to the LSB's Requirements, Guidance and Statement of Policy and setting out further detail on our existing requirements, how we have reviewed them and applied to the LSB to strengthen them in some areas. We have also set out the work we have been doing and will continue to do so to raise standards in complaints handling and improve outcomes for consumers. This includes our plans for monitoring and evaluating the impact of our policy work going forward and how we work collaboratively with other regulators and LeO.

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Introduction

This document is the SRA's response to the Legal Services Board (LSB) [Requirements, Guidance and Statement of Policy to regulators](https://legalservicesboard.org.uk/our-work/lsb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules) [https://legalservicesboard.org.uk/our-work/lsb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules] that were issued on 16 May 2024. Covering each of the LSB requirements and expectations, we set out:

- the existing requirements in our Standards and Regulations and expectations on those we regulate for handling complaints
- how we have reviewed and strengthened these in light of evidence that things are not working as well as they should be
- the work we have been doing, and will continue to do, to raise standards in complaints handling and improve outcomes for consumers and
- what our plans are for monitoring and evaluating the impact of our policy work going forward, including how we work with other regulators and the Legal Ombudsman (LeO).

Background



The LSB's Requirements, Guidance and Statement of Policy

On 16 May 2024 the LSB issued [Requirements, Guidance and a Statement of Policy to regulators](https://legalservicesboard.org.uk/our-work/lwb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules) [https://legalservicesboard.org.uk/our-work/lwb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules] to improve the way in which first-tier complaints (complaints made directly to a legal service provider) are handled.

These measures aim to drive significant improvements in complaints handling by ensuring that, wherever possible, complaints are dealt with promptly and as close as possible to source. The LSB states that: 'consumers should feel empowered to know that their complaint will be taken seriously, and that their feedback will be used to improve services.'

Complaints procedures should be easy for users to find, and they should be able to make complaints in the way that suits them best. Clear information on how to make a complaint should be provided when needed and, if a complaint is made, updates on progress should be given. Legal service users should feel confident that a complaint will be handled fairly and promptly, without any negative consequences for them'.

The LSB's Statement of Policy states that regulators must pursue the following outcomes:

- The best possible complaints resolution system for legal services users by using information and intelligence gathered from first-tier complaints and second-tier complaints;
- A culture of continuous improvement and learning from complaints and feedback to improve legal services.

In pursuing these outcomes, regulators should take account of relevant guidance and good practice in this space from, for example, LeO.

Together, the Requirements, Guidance and Statement of Policy aim to deliver a step-change improvement in first-tier complaints handling by ensuring that complaints are dealt with effectively, efficiently and fairly.

The SRA's policy work

We agree that complaints are a key indicator of service quality in legal services and help demonstrate to consumers 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.

There are existing mechanisms for assuring standards in first-tier complaints for SRA regulated firms and individuals within our [Standards and Regulations framework](https://www.sra.org.uk/solicitors/standards-regulations/) [https://www.sra.org.uk/solicitors/standards-regulations/].

Through 8.2-8.5 of the [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/], 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] and Rule 2 of the [Transparency Rules](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/) [https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/] we set out our

expectations about service standards and specifically in relation to complaints handling. These are that the firms and individuals we regulate must:

- have a complaints procedure, which should be published on their website if they have one, or made available on request if they do not have a website
- deal with complaints promptly, fairly and free of charge
- signpost to LeO for complaints about poor service and to us for any concerns about conduct.

We also provide [guidance](https://www.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/) [https://www.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/] for those we regulate to help them meet our requirements on publishing complaints procedures and the information this should include.

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/) [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 and undertake a programme of work in this area, making sure our regulatory requirements are credible and robust.

Key evidence

Through the [data](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/] that they report to us each year when they renew their practicing certificates, solicitors and firms have indicated that the number of complaints received and resolved has generally increased over the past 10 years. In 2024, firms told us that 82 per cent of complaints were resolved at first-tier to the satisfaction of the client – which is the highest reported since 2012 when we started collecting this data. We see this as a positive indicator about how solicitors and firms are receiving and resolving complaints.

However, we have evidence from our compliance monitoring and from our stakeholders that wider improvements in complaints handling are needed to raise standards and improve outcomes for consumers.

Our compliance monitoring and [year-3 evaluation of our Transparency Rules](https://www.sra.org.uk/globalassets/documents/sra/research/year-three-evaluation-of-the-sra-transparency-rules.pdf) [https://www.sra.org.uk/globalassets/documents/sra/research/year-three-evaluation-of-the-sra-transparency-rules.pdf] identified that firms are not always publishing their complaints procedures as required, or are including incorrect or partial information when signposting to LeO. Our year-5 evaluation is underway and early findings indicate that there has been some improvements in signposting that we will continue to monitor as the work develops.

LeO [found](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] that 46 per cent of its complainants in 2023/24 experienced poor complaints handling, highlighting issues such as inconsistent or complex complaints processes or defensive attitudes from legal service providers when handling complaints.

The Legal Services Consumer Panel (LSCP) also [called for](https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done/) [https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done/] more to be done by approved regulators to improve complaints handling. Its annual [Tracker Survey](https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2025/07/25.07.07-How-consumers-are-choosing-legal-services-report-2025.pdf) [https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2025/07/25.07.07-How-consumers-are-choosing-legal-services-report-2025.pdf] has consistently found that many legal services consumers do not know how to complain (51 per cent in 2024). In this same research, nearly a third of



consumers stated they would not raise issues directly with their provider, citing barriers like fear, mistrust or concern over delays and costs.

Thematic review and survey

In January-March 2025, to further explore these issues and help us to understand how firms identify, manage and learn from complaints, we carried out a [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [\[https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/\]](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/). We visited 25 firms and reviewed 50 complaints files. We also sent a survey to 750 firms covering a diverse range of characteristics and areas of work.

We found variation in how firms identified, defined and handled complaints. There were a number of examples of good practice, including how some firms supported vulnerable clients. However, we found areas where improvements were needed and where we think our requirements and expectations could be strengthened. There were also areas where firms asked for more guidance and support such as managing challenging situations when handling complaints. We have included further detail on the findings from our thematic review and survey in response to the individual LSB expectations throughout this response.

Our consultation

Using the evidence we gathered and the LSB's Requirements, Guidance and Statement of Policy, we developed proposals and [consulted](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-rtc/?s=c) [\[https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-rtc/?s=c\]](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-rtc/?s=c) on them between 30 May and 1 August 2025.

We sought views on proposals to:

- Make changes to when complaints information must be provided to a client, adding in that it must be provided on conclusion of the legal matter, upon request and if a complaint is made during the matter.
- Require complaints information to be clear, accessible and in a prominent place on a firm's website, where they have one (and made available on request when they don't have a website).
- Include the LSB's definition of a complaint in our glossary of defined terms.
- Develop new complaints handling guidance to help those we regulate to understand how to meet our Standards and Regulations. This included combining new guidance with our existing guidance on publishing complaints procedures.

We also sought input on two further areas. These were:

- Collecting and publishing additional complaints data on the timeliness with which solicitors and firms resolve complaints; and
- Co-development of a model complaints resolution procedure with LeO.

We received 75 written responses – the majority from solicitors, law firms and sector representatives including local law societies. We received responses from some consumer organisations – including the LSCP.

We also heard views through a [stakeholder engagement programme](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/rtc---summary-of-feedback-) [\https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/rtc---summary-of-feedback-



[from-engagement-programme.pdf](#)] that involved:

- Focus groups – two face-to-face and one virtual, with 28 consumers from a range of backgrounds, ages, ethnicities and a mix of men and women. The majority had used a solicitor in the last two years, and we included people that were less digitally confident, digitally excluded, from rural locations, and from Wales.
- A roundtable with 14 consumer groups, asking for experiences of complaining in legal services and suggestions for improvements. Organisations included those that support people with immigration and asylum, ethnic minorities and women, and some that supported people with a disability. This was also attended by the LSCP and LeO.
- Two roundtable events with the profession – one with 12 solicitors and law firms and one with 21 local law societies and The Law Society.

Consultation outcome

Having analysed and carefully considered responses to the consultation and feedback from our stakeholder engagement, we published our [consultation response](#) [<https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-consultation-response.pdf>] and submitted our [application](#) [<https://legalservicesboard.org.uk/wp-content/uploads/2025/10/SRA-application-to-LSB-changes-to-first-tier-complaints-regulatory-arrangements-14-10-2025.pdf>] to the LSB for formal approval of regulatory changes on 14 October 2025.

This application set out our plans to proceed with the proposals that we consulted on, as detailed above. We have included a [draft of our new complaints handling guidance](#) [<https://legalservicesboard.org.uk/wp-content/uploads/2025/10/Annex-4-Draft-complaints-handling-guidance.pdf>] as an annex to our application. We will also proceed to collect more complaints data in 2026 and continue to work with and support LeO in developing its model complaints resolution procedure.

Our engagement with the LSB

On 14 October we submitted our [application](#) [<https://legalservicesboard.org.uk/wp-content/uploads/2025/10/SRA-application-to-LSB-changes-to-first-tier-complaints-regulatory-arrangements-14-10-2025.pdf>] for changes to our regulatory arrangements relating to first-tier complaints to the LSB. If approved by the LSB, we propose to give those we regulate 3 months to implement the changes from the date of approval.

Ahead of submission we were pleased to have helpful and constructive engagement with the LSB as our proposals and plans for our application developed. This included meetings and sharing an early draft of the application. This response reflects those conversations.

In this response, we have covered the LSB's Requirements and Guidance by area, and where our existing requirements meet these or where our new requirements, if approved, will fill any gaps we identified.

The areas as set out in the LSB's Requirements and Guidance are: Consumer confidence, Accessibility, Provision of information, Communication, Learning and improvement and Enforcement.



We have also covered each of the expectations from the LSB's Statement of Policy and the work we are doing, and plan to continue to do, to meet them.

The LSB's requirements and how we are meeting them

SRA existing requirements and resources

Solicitors have a duty to provide a good standard of service, as we set out in our [Principles](https://www.sra.org.uk/solicitors/standards-regulations/principles/?epiprojects=1931) [https://www.sra.org.uk/solicitors/standards-regulations/principles/?epiprojects=1931]. There are existing mechanisms for assuring standards in first-tier complaints for SRA regulated firms and individuals within our [Standards and Regulations framework](https://www.sra.org.uk/solicitors/standards-regulations/) [https://www.sra.org.uk/solicitors/standards-regulations/].

Through 8.2-8.5 of the [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/], 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] and Rule 2 of the [Transparency Rules](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/) [https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/] we set out our expectations about service standards and specifically in relation to complaints handling. These are that the firms and individuals we regulate must:

- have a complaints procedure, which should be published on their website if they have one, or made available on request if they do not have a website
- deal with complaints promptly, fairly and free of charge
- signpost to LeO for complaints about poor service and to us for any concerns about conduct.

We provide [guidance on publishing complaints procedures](https://www.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/) [https://www.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/] for those we regulate to help them meet our requirements in relation to Rule 2 of the [Transparency Rules](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/) [https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/]. This includes suggested text for those we regulate to provide information about their complaints process, in addition to how to raise concerns to LeO and ourselves. This guidance was developed with LeO. It also signposts to LeO's resources that provide further help on handling complaints.

We collect and publish aggregate data each year in our [annual First Tier Complaints Report](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/]. This is the number of complaints received, resolved and escalated to LeO, which can be broken down by area of practice and compared to other data, such as the size of firm.

Sharing this data helps benefit consumers by raising awareness of complaints handling and enables solicitors and firms we regulate to benchmark themselves and improve their standards of service.

Through this data, individuals and firms have indicated that the number of complaints received and resolved has generally increased over the past 10 years. In 2024, they told us that 82 per cent of complaints were resolved at first-tier to the satisfaction of the client – which is the highest reported since 2012 when we started collecting this data. We see this as a positive indicator about how solicitors and firms are receiving and resolving complaints.

SRA new requirements and resources



However, the evidence set out by the LSB in its [consultation on first-tier complaints](https://legalservicesboard.org.uk/wp-content/uploads/2024/05/Consultation-document-on-first-tier-complaints-with-annexes.pdf) [https://legalservicesboard.org.uk/wp-content/uploads/2024/05/Consultation-document-on-first-tier-complaints-with-annexes.pdf], evidence from [LeO](https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) [https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf] and the [LSCP](https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done) [https://www.legalservicesconsumerpanel.org.uk/blog/first-tier-complaints-more-needs-to-be-done] and from our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/#:~:text=We%20set%20out%20in%20our,to%20implement%20by%20November%202025.) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/#:~:text=We%20set%20out%20in%20our,to%20implement%20by%20November%202025.] identified that improvements were needed.

We therefore identified areas where our rules could be strengthened and where we could provide further support through guidance. We want to build on our existing requirements and guidance, and resources that are already available from other stakeholders. This was raised during our thematic review visits and in response to our consultation when we asked for views about guidance. Respondents wanted it to give clarity and not be confusing or duplicate resources such as those provided by LeO.

The LSB's Requirements set out that an approved regulator must satisfy the Requirements in its regulatory arrangements and have regard to the Statutory Guidance.

Under each of the LSB areas of: Consumer confidence, Accessibility, Provision of information, Communication, Learning and improvement and Enforcement, we have explained how our existing requirements meet the desired outcomes, as well as highlighting areas that will be met by our proposed new requirements (subject to LSB approval) and new complaints handling guidance.

Our new guidance is structured to inform those we regulate of our mandatory requirements (both our existing requirements and the new requirements we have applied for). These are followed by good practice tips. We will supplement this with illustrative case studies gathered through our thematic reviews, both into first-tier complaints handling and other thematic reviews where we included consideration of complaints, including probate and estate administration.

The guidance was informed by consultation responses as well as our [engagement programme](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf?epiprojects=193) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf?epiprojects=193] with consumers, consumer groups, solicitors, law firms and law societies. We also engaged directly with key stakeholders LeO and The Law Society on the draft guidance to gather their feedback.

Consumer confidence

Paragraphs 7 and 8 of the LSB's Requirements set out the requirements that regulators must satisfy in their regulatory arrangements for authorised persons' complaints procedures in respect of ensuring consumer confidence in the complaints process.

Our regulations under 8.2-8.5 of our [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2], 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] and Rule 2 of our [Transparency Rules](#)



[\[https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/\]](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/) set out that the firms and individuals we regulate must:

- have a complaints procedure, which should be published on their website if they have one, or made available on request if they do not have a website
- deal with complaints promptly, fairly and free of charge
- signpost to LeO for complaints about poor service and to us for any concerns about conduct
- inform clients, in writing, of their right to complain to LeO and the timeframe for doing so, if a complaint has not been resolved to the client's satisfaction within 8 weeks following the making of a complaint.

Our proposed changes to these regulations will further meet the wording of the LSB's Requirements on 'consumer confidence'.

The introduction of a definition of a complaint will improve consistency in the identification and handling of complaints. In our new complaints handling guidance we have included information about our expectations on how complaints are handled. This includes that complaints should be resolved at the earliest opportunity and that firms and individuals should communicate the outcome of the complaint promptly to the complainant. They should also comply promptly with remedies if accepted by the complainant.

We have included that solicitors should be reviewing their complaints files to ensure that they are assessing complaints impartially, fairly and consistently. This will support and encourage competent, diligent and impartial outcomes.

Accessibility

Paragraph 9 of the LSB's Requirements deals with the requirement for complaints procedures to be easily accessible to consumers. It sets out steps that regulators must satisfy in their regulatory arrangements for authorised persons' complaints procedures in respect of accessibility, and how information on the complaints procedure needs to be provided to a client.

Our regulations under 8.5 of our [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2) [\[https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2\]](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2) and 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [\[https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/\]](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) set out that complaints should be dealt with promptly, fairly and free of charge.

3.4 of the [SRA Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/) [\[https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/\]](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/) sets out that solicitors should consider and take account of their client's attributes, needs and circumstances.

Our [Statement of solicitor competence](https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/) [\[https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/\]](https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/) also provides more detail on what a proper standard of service for people who are vulnerable means:

- C1: Communicate clearly and effectively, orally and in writing, including responding to and addressing individual characteristics effectively and sensitively; and



- C2: Establish and maintain effective and professional relations with clients, including providing information in a way that clients can understand, taking into account their personal circumstances and any particular vulnerability.

We have reminded individuals and firms of our requirements in these areas in the new complaints handling guidance.

The new guidance also includes a number of good practice tips on accessibility and supporting vulnerable clients. These are:

- how to support clients in making complaints in a way that is reasonable and accessible to them
- giving examples of adjustments solicitors and firms could make
- giving suggestions for providing information in alternative formats
- how to make a website accessible – including signposting to the [Web Content Accessibility Guidelines](https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag) (<https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag>) (known as WCAG), an internationally recognised set of recommendations for improving web accessibility
- making information available for those who are not digitally confident or digitally excluded in alternative formats.

It also provides information for individuals and firms on vulnerability, and what they should consider. For example:

- clients may be reluctant to disclose a vulnerability and the importance of building trust
- that there may be a feeling of an imbalance of power for clients when seeking professional advice about what can be a difficult or distressing matter.

The new guidance signposts to our other existing guidance such as our [guidance on meeting the needs of vulnerable people](https://www.sra.org.uk/solicitors/resources/specific-areas-of-practice/meeting-needs-vulnerable-people/) (<https://www.sra.org.uk/solicitors/resources/specific-areas-of-practice/meeting-needs-vulnerable-people/>). This provides advice to support solicitors and firms in identifying vulnerabilities. Our [guidance on Complying with Principle 6 - encouraging equality, diversity and inclusion](https://www.sra.org.uk/solicitors/guidance/sra-approach-equality-diversity-inclusion/) (<https://www.sra.org.uk/solicitors/guidance/sra-approach-equality-diversity-inclusion/>) sets out the benefits in building and maintaining an inclusive workplace - including that members of the public are more likely to seek legal help if they can see that legal service providers share some of their social or cultural characteristics.

It signposts to other useful resources and toolkits that were shared with us by the consumer organisations we engaged with, such as a Disability Wales' [Social Model of Disability Toolkit](https://www.disabilitywales.org/wp-content/uploads/2024/08/SMD-Toolkit.pdf) (<https://www.disabilitywales.org/wp-content/uploads/2024/08/SMD-Toolkit.pdf>).

The guidance was informed by consultation responses and our [engagement programme](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-summary-of-feedback-from-engagement-programme.pdf) (<https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-summary-of-feedback-from-engagement-programme.pdf>). We were keen to particularly gather views and input from the consumer organisations we engaged with, many of which support people who may be vulnerable due to their circumstances, for example in immigration and asylum matters, or their characteristics, such as having a disability. This is because research has identified that people who are vulnerable can face additional barriers when



making complaints, so their involvement was key in our policy-development and in ensuring that it helps solicitors and firms to best support consumers.

Accessibility and supporting vulnerable clients were also areas where the solicitors we engaged with requested further detail and guidance from us. We were able to shape the areas and detail that the guidance covers accordingly.

We have applied to expand Rule 2 of our Transparency Rules to require complaints information to be clear, accessible and in a prominent place on a firms' website, where they have one (and made available on request when they do not have one). This wording mirrors Rule 1.6 of our Transparency Rules for cost information.

To support the implementation of this, we have given examples of what we mean by 'prominent place' in the new complaints handling guidance. These are:

- having a direct link on a homepage, that is easy to read and clearly worded such as 'our complaints procedure'.
- that it may only require one or two clicks from a homepage to reach it.

We have expanded further on this to provide guidance on how information can be made 'easy to find' for consumers online, for example when undertaking internet searches. These are that:

- users should be able to easily navigate to the complaints information
- using the word 'complaint' in the title and meta title will help public search engines to index the pages so they appear in search results and AI responses
- solicitors and firms should also consider the font style and colour used.

The new guidance also provides detail and examples of our expectations that meet the LSB's Requirements on accessibility. These are: the stages that will be taken in resolving a complaint, information on the possible outcomes, including the options for where a complaint is not resolved to a complainants satisfaction, that it is endorsed by senior management, where relevant and implemented consistently and periodically reviewed.

Provision of information

Paragraphs 11, 12 and 13 of the LSB's Requirements set out what regulators must include in their regulatory arrangements for authorised persons' complaints procedures in respect of the information that must be provided about making complaints, how, and when this must be done.

Our regulations under 8.3-8.5 of the [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-21) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-21] and 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] set out that clients must be informed in writing at the time of engagement about their right to complain about services and charges, how a complaint can be made and to whom and any right they have to make a complaint to LeO and when they can make such a complaint.

It also sets out that if a complaint has not been resolved to the client's satisfaction within 8 weeks following the making of that complaint, that the



client is informed, in writing, of their right to complain to LeO, the timeframe for doing so and full details of how to contact LeO.

To fully meet the LSB's requirement in this area we have applied to expand Rule 8.3 to include the additional times that complaints information must be provided. These are: on conclusion of the legal matter, upon request and if a complaint is made during the matter.

In our new complaints handling guidance, we have provided good practice tips in supporting those we regulate to meet our proposed new requirements in this area.

We have suggested that where a solicitor or firm provide a closing letter to a client, this may be a good place to include the mandatory information on complaints at the end of the matter, along with asking for feedback such as through an online review. We have also said in the case of a complex or long-running case, an appropriate end point should be identified to provide information about the complaints procedure. This was informed by feedback from the solicitors and firms who responded to our consultation or that we engaged with through our engagement programme.

The new complaints handling guidance also references that there are independent complaints resolution tools to help consumers raise complaints that can be a helpful support tool. We suggest that solicitors and firms should communicate clearly whether they accept complaints via this route. We also say that if they have any concerns about the tool or provider, such as them charging a fee in helping a client to raise a complaint, they should tell the client and make them aware that they can make the complaint themselves, providing them with the details on how to do this. This was informed by a case study from our thematic review of first-tier complaints handling.

Communication

Paragraphs 14 to 16 of the LSB's Requirements set out the matters that regulators must satisfy in their regulatory arrangements for authorised persons' complaints procedures in respect of information that must be provided to complainants and how this is communicated.

Our regulations under 8.5 of our [Code of Conduct for Solicitors, RELs, RFLs and RSLs](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/#rule-8-2] and 7.1 (c) of our [Code of Conduct for Firms](https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/) [https://www.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] set out that complaints should be dealt with promptly, fairly and free of charge.

In our new complaints handling guidance we have included detail on our expectations around this. We detail the LSB Requirements of: providing prompt acknowledgements, information on how the complaint will be handled, details of who the complainant may contact and including a timeline for the resolution of the complaint.

Learning and improvement

Paragraphs 17 and 18 of the LSB's Requirements set out the requirements that regulators must satisfy in their regulatory arrangements for authorised persons'



complaints procedures in respect of the measures an authorised person takes to identify and resolve risks arising from complaints, and the training and support it provides to address these risks and issues.

We have set out below our approach to learning and improvement for those we regulate.

We require solicitors to maintain their competence to carry out their role, which is set out in the [Statement of solicitor competence](https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/) [https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/]. This means they must keep their knowledge and skills up to date, including any relevant legal, ethical and regulatory obligations relevant to their role. We expect them to reflect and identify, plan and address how they will address their learning and development needs and record and evaluate on this. As part of the annual certificate renewals, solicitors with a practising certificate and registered European or Swiss lawyers, must declare that they:

- have up to date understanding of the legal, ethical and regulatory obligations relevant to their role and
- have reflected and addressed any identified learning and development needs; and
- are competent to perform their role.

We do not prescribe how a solicitor should meet their continuing competence requirement. Solicitors have flexibility to determine their approach to learning and development in a way that best suits their practice and learning style. Nor do we require that solicitors must evidence their completed learning and development. However, we regularly require solicitors to provide evidence to us that they are maintaining their competence, for example, through our training record reviews. One way a solicitor can do this is by recording learning and development to demonstrate that they have taken steps to keep their knowledge and skills up to date.

Since 2023 we have also published an [annual assessment of continuing competence](https://www.sra.org.uk/sra/research-publications/annual-assessment-continuing-competence-2025/) [https://www.sra.org.uk/sra/research-publications/annual-assessment-continuing-competence-2025/], sharing our insights into how solicitors are keeping their knowledge and skills up to date to maintain their competence. Each report is designed to drive positive learning and development behaviour. We highlight examples of good practice, as well as challenges some face. We encourage solicitors and firms to consider our findings carefully and assess potential risks to how they maintain their competence.

In 2025 we included complaints data in the development of our annual assessment of competence. We will continue to consider complaints data as part of this annual assessment and for 2026 explore how solicitors are incorporating learning from complaints into their learning and development.

In our new complaints handling guidance, we have included a section on learning and improvement. This sets out our mandatory requirements and good practice tips for both individual solicitors who are responsible for their own learning and development, and those responsible for supporting staff with complaints handling within a firm.

We have highlighted the areas from the LSB requirements about implementing measures to identify risks or issues, including systematic issues and then

undertaking training (for individuals) or providing support and training (when someone is responsible for staff handling complaints).

We have included areas where the solicitors and firms we engaged with through our thematic review and consultation responses asked for support. These include handling third-party complaints, such as from beneficiaries, and accessibility and supporting vulnerable clients. Having clear guidance on these areas will help in their learning and improvement.

We have also published our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/] which solicitors and firms can use as a helpful resource. It includes examples of good and poor practice as well as case studies. In both the thematic review and our new guidance, we signpost to other SRA guidance they may find helpful as well as resources from our stakeholders such as LeO, The Law Society and from consumer organisations that support with accessibility.

Enforcement

Paragraph 19 of the LSB's Requirements provides that regulators' regulatory arrangements must specify proportionate and targeted action a regulator may take for non-compliance with their regulatory arrangements.

Our [Enforcement Strategy](https://www.sra.org.uk/sra/corporate-strategy/sra-enforcement-strategy/) [https://www.sra.org.uk/sra/corporate-strategy/sra-enforcement-strategy/] sets out our approach to taking regulatory action in the public interest. In accordance with this, we monitor compliance with our existing requirements and would do so with any new requirements that are introduced.

As an example, we have set out below how we have monitored compliance with our Transparency Rules through an ongoing programme to check law firm websites.

In 2018 we introduced [Transparency Rules](https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/) [https://www.sra.org.uk/solicitors/standards-regulations/transparency-rules/] which require firms to publish information on prices (in certain areas of law) and how services will be delivered. These rules also require all firms to make their complaints procedures available on their website, or offline if they do not have a web presence.

In 2021 we asked all law firms with a website to complete a mandatory declaration confirming that they were complying with these Rules. The majority replied that they were. We then conducted 'spot checks' on a sample of those firm websites, which suggested that as many as two-thirds were not actually in full compliance.

As a result, we undertook an ongoing programme to check law firm websites. As part of this work, where we find sites not compliant with all elements of the rules, we contact firms to let them know what is missing. We give them a period of time to address our concerns and if they fail to do so, we investigate and take appropriate action such as issuing official warnings and fixed-financial penalties where required. We have also published [updated resources](https://www.sra.org.uk/news/news/press/2024-press-releases/updated-resources-comply-transparency-rules/) [https://www.sra.org.uk/news/news/press/2024-press-releases/updated-resources-comply-transparency-rules/] to support firms to meet our requirements.

In total, since this work began in 2023, we have:



- Assessed the websites of 2117 firms
- Issued 838 letters of warning to firms who submitted an inaccurate declaration in 2021
- Brought 1126 firms into compliance
- Issued 55 fixed financial penalties

These figures include instances where the firm was not providing the correct information about complaints on their website – such as failing to publish a complaints procedure or failing to signpost correctly to LeO.

We have also commissioned an independent evaluation of our Transparency Rules and published our [year-3 evaluation](https://www.sra.org.uk/sra/research-publications/year-three-evaluation-sra-transparency-rules/) [https://www.sra.org.uk/sra/research-publications/year-three-evaluation-sra-transparency-rules/] in 2023. Our year-5 evaluation is underway and due to be published in 2026.

We will continue to monitor and enforce requirements for complaints handling, including our Transparency Rules and at paragraphs 8.2 to 8.5 in our Code of Conduct for Solicitors, RELs, RFLs and RSLs and 7.1 (c) of our Code of Conduct for Firms, to secure compliance. We have also included further information below about our overall approach to monitoring and evaluation of our policy-programme as a whole.

Monitoring and evaluation

As set out in the [Regulatory Impact Assessment](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---regulatory-impact-assessment.pdf) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---regulatory-impact-assessment.pdf] we published alongside our consultation response, we will undertake an evaluation exercise so that we can maximise the positive impacts of the proposed changes to our regulatory arrangements and our complaints information programme as a whole.

We will link this to our overall work on information transparency and quality indicators. We are currently undertaking a year-5 evaluation of our Transparency Rules including our existing requirements on complaints. This will be published in 2026. We will then consider what our next steps are in relation to these wider rules and factor in how the changes we make now will fit with any future monitoring and evaluation of our more comprehensive approach, whilst still allowing us to identify the specific impacts of the changes we are making now.

In monitoring and evaluating the changes we are proposing, we will also ensure that we identify and understand the reasons for any unintended consequences. We will use the data and evidence gathered in our survey and thematic review, as well as that of our stakeholders, to provide a baseline for the changes we are making and monitor the impact. This includes using data from LeO, the LSB Legal Needs Survey and LSCP Tracker Survey. We will also use our engagement with consumer groups to understand and identify impact on different consumer groups.

We will continue to work collaboratively with the other frontline regulators and LeO to evaluate the impact of the changes to the overall complaints handling landscape in legal services and improvements to both the standards of complaints handling and the outcomes for consumers.



The expectations of the LSB policy statement and how we are meeting them

Alongside its Requirements and statutory Guidance, the LSB issued a [Statement of Policy](https://legalservicesboard.org.uk/wp-content/uploads/2024/05/First-Tier-Complaints-Policy-statement.pdf) [https://legalservicesboard.org.uk/wp-content/uploads/2024/05/First-Tier-Complaints-Policy-statement.pdf] under section 49 of the Legal Services Act 2007. The purpose is to set outcomes and expectations on regulators in respect of learning from intelligence gathered from first and second-tier complaints. It sets out that regulators must pursue the following outcomes:

- The best possible complaints resolution system for legal services users by using information and intelligence gathered from first-tier complaints and second-tier complaints;
- A culture of continuous improvement and learning from complaints and feedback to improve legal services.

In pursuing these outcomes, regulators should use intelligence gathered from first-tier and second-tier complaints to meet the expectations. We have set out beneath each LSB expectation our work in those areas and how we meet them.

- i. Identify any thematic areas of weakness in authorised persons' handling of first-tier complaints, and take action to address these

Our thematic review

In January-March 2025 we carried out a targeted [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/] that we published on 14 October. We visited 25 firms and reviewed 50 complaints files. We also sent a survey to 750 firms covering a diverse range of characteristics and areas of work.

This was informed by the evidence we had from our compliance monitoring and from our stakeholders. We wanted to explore issues and understand in greater detail how firms identify, manage and learn from complaints.

An SRA thematic review is a deep dive into a specific set of risks or issues. Through our thematic reviews we engage with law firms, solicitors and other relevant stakeholders to understand the issues and challenges firms face in the area and gather insights about how firms are addressing them. Thematic reviews provide an important source of intelligence and play a key role in shaping our policy approach.

Our thematic reviews are also intended to support our regulated community. Our published reports set out the relevant issues for firms and provide examples of both good and poor practice that we have seen. This is intended to support firms and solicitors to reflect on their own practices and to make improvements where they can. Where we identify any serious concerns or potential misconduct during a review, we can open formal investigations into these firms.

For our thematic review of first-tier complaints handling, 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 thematic review and survey have provided us with a rich evidence base for our policymaking and informing our consultation proposals. It helped us to identify areas in our current regulatory framework where we could strengthen our requirements and be clearer in our new guidance to help support those we regulate to meet them.

We have highlighted below the areas of weakness that the thematic review found. We have sought to take action on each of these through our proposed strengthened rules and our new complaints handling guidance by including good practice examples and case studies. We also referred one of the interviewees directly to our Investigations team, due to concerns that they did not have an effective complaints handling procedure.

Areas we identified for further action from the thematic review are:

Recognising a complaint

- Assuming fee earners or other staff will recognise complaints and know what to do, without training, support or guidance.
- Only accepting complaints made in writing or insisting a client attend a face-to-face meeting as part of the complaint procedure.
- Making it difficult for clients to access the complaints procedure, such as including it in small text at the bottom of a webpage that isn't the homepage or requiring clients to click through several pages to locate it.
- Responding inappropriately to online reviews (for example, sending defensive or dismissive responses).

Dealing with complaints

- Adopting a financially driven approach where it is easier to offer a financial remedy without considering the merits of a complaint.
- Not considering or adapting approaches to dealing with clients with additional needs, or who may be vulnerable.
- Not explaining the rationale for the firm's decision on a complaint.
- Adopting a defensive or dismissive tone.
- Sending complicated or lengthy responses.
- Intentionally delaying responses.
- Using the complaint response to deal with other issues, for example outstanding costs, where this is not the subject of the complaint.

Insights from complaints



- Not looking out for trends or themes in complaints received and resolved;
- Not considering ways to improve response times to complaints; and
- Ignoring the reasons why clients are bringing complaints. This risks issues being repeated.

Our thematic review also highlighted key areas where solicitors and firms asked for more support, that we have included in our new complaints handling guidance. This includes third-party complaints, accessibility and supporting vulnerable clients and examples of what a 'prominent place' on websites are for a complaints procedure. We have also included a section on 'support for solicitors' after it was raised that handling complaints can have an impact on solicitors' wellbeing.

This thematic review, and our thematic reviews into other areas of work, provided us with good practice examples that we have used as illustrative case studies. These were also requested by those we regulate as a helpful resource that can make the guidance more meaningful.

Internal engagement and information sharing

We have worked closely with other teams within the SRA that engage directly with solicitors and firms, such as our Professional Ethics team and Regulatory Management team. These teams have shared insight that has shaped our proposals as well as the areas we have covered in the new guidance. When the new guidance and case studies are published, SRA staff will be able to signpost to it and support the solicitors and firms they engage with in finding and understanding it. If our application for changes to our regulatory arrangements is approved, these teams will be able to offer support and advice on this – including raising awareness that we are giving the profession 3 months from the date of approval to implement the changes.

External engagement and information sharing

The thematic review also highlighted that many solicitors and firms use LeO resources and so we have been able to build on our engagement with LeO and link to its existing resources, avoiding duplication. We have also been able to share this feedback with LeO as it develops new resources and toolkits as part of its work in [developing a model complaints resolution procedure](https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/) [<https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/>].

This stakeholder engagement has also helped us to identify areas of weakness in how solicitors and firms were handling complaints.

LeO [wrote to us](https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) [<https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf>] in November 2024 setting out the themes and concerns it had in how legal service providers were handling complaints. These were:

- Failing in their culture and attitude – such as taking a defensive or confrontational approach to complaints, showing no empathy or understanding of clients' experience.
- Failing in their processes and information – such as giving out-of-date and inaccurate information about the complaints process



- Failing in their responses and remedies – such as offering insincere apologies or failing to take, and see the benefit of, a coherent and proactive approach to putting things right at the earliest opportunity.

These thematic areas of weakness highlighted by LeO informed our approach to this policy work in strengthening our rules and developing new guidance and case studies.

We have worked closely with LeO in supporting the development of its model complaints resolution procedure and other resources to support legal service providers in complaints handling.

This collaborative work and providing more support and guidance to firms encourages greater consistency in approaches across legal services and at both first and second-tier, helping consumers know what to expect and support solicitors and firms of varying sizes in being consistent and benchmarking themselves and their service standards.

- ii. Identify any authorised persons with disproportionately and consistently high:
 - numbers of first-tier complaints
 - premature complaints being made to the Legal Ombudsman and take appropriate and effective action to address these;
- iii. identify any recurring issues or trends arising in first-tier complaints from which authorised persons, other regulators and others in the legal services sector can learn lessons

We collect and publish aggregate data each year in our [annual First Tier Complaints Report](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/]. This is the number of complaints received, resolved and escalated to LeO, which can be broken down by area of practice and compared to other data, such as size of firm.

Sharing this data helps benefit consumers by raising awareness of complaints handling and enables individuals and firms we regulate to benchmark themselves and improve their standards of service. Through this data, firms have indicated that the number of complaints received and resolved has generally increased over the past 10 years. In 2024, firms told us that 82 per cent of complaints were resolved at first-tier to the satisfaction of the client – which is the highest reported since 2012 when we started collecting this data.

We also have second-tier complaints data and insight shared with us from LeO directly, as well as using what it [publishes annually](https://www.legalombudsman.org.uk/information-centre/data-centre/complaints-data/) [https://www.legalombudsman.org.uk/information-centre/data-centre/complaints-data/]. This includes data on premature complaints (when complaints have been raised with LeO before someone has been through the solicitor's first-tier complaints procedure).

We regularly meet with LeO to share intelligence and insight, including on individual cases where appropriate. We used the data on themes and specific firms that LeO [shared with us](https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf) [https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf] in November 2024 to inform our approach to this policy work, being sure to include the firms in our survey or thematic visits. We are also exploring how we can use this data within our Intelligence team.



LeO has also run regular Regulator Forums on complaints handling, bringing together the frontline regulators to discuss our respective approaches and policy work on complaints. This Forum has also enabled LeO to share updates on its development of its [model complaints handling procedure](https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/) [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/] and its [tailored support programme](https://www.legalombudsman.org.uk/information-centre/news/leo-news-35/providing-tailored-support/) [https://www.legalombudsman.org.uk/information-centre/news/leo-news-35/providing-tailored-support/] for firms.

We monitor compliance with our Standards and Regulations through our enforcement strategy as set out below and take action when these are not being met. In September 2025 we shared information on our website about the [LSB Directions and improving our regulatory approach](https://www.sra.org.uk/sra/corporate-strategy/lsb-directions/) [https://www.sra.org.uk/sra/corporate-strategy/lsb-directions/].

This explained that we are fundamentally changing our approach to regulation in light of increasing challenges and changes across the sector. We are shifting from largely responding to complaints about solicitors and problems to proactively identifying and acting on emerging and increasing risks before they lead to public harm.

A key part of this is by progressing our Risk and Data programme to improve how we use data and intelligence to, where possible, identify risks earlier.

Both first and second-tier complaints data and insight will be included as part of this programme of work.

We will also continue to work collaboratively with LeO to improve the data we share to raise standards in the sector, and share lessons learned across other regulators and others in the legal services sector. For example, we will continue to support LeO in its development of resources such as the model complaints handling procedure as well as its initiatives such as its tailored support programme.

- iv. identify any areas of good practice and collaborate in sharing these with authorised persons, other regulators and others in the legal services sector. This might include examples of good practice from the Legal Ombudsman as well as from other sectors

Through our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/] we identified a number of areas of good practice which we shared in the report alongside case studies. We have used these to inform the new complaints handling guidance that we have developed. We also drew on relevant good practice relating to complaints identified in thematic reviews into other areas, such as [high-volume consumer claims](https://www.sra.org.uk/sra/research-publications/high-volume-consumer-claims-thematic-review/) [https://www.sra.org.uk/sra/research-publications/high-volume-consumer-claims-thematic-review/] and [probate and estate administration](https://www.sra.org.uk/sra/research-publications/probate-administration-thematic-review/) [https://www.sra.org.uk/sra/research-publications/probate-administration-thematic-review/].

Alongside the new guidance, we will publish illustrative case studies which the solicitors and firms we engaged with said they would find helpful. We engaged with LeO and The Law Society when developing the guidance and incorporated their feedback where possible.

The solicitors and firms we engaged with as part of our thematic review and survey told us that they made use of resources produced by other organisations such as LeO and The Law Society. In our new complaints handling guidance we have included links to these resources as well as signposting to other sections of our website that might be helpful, including wellbeing support for solicitors. By signposting directly to the resources of other organisations, rather than duplicating ourselves, we have avoided confusion for solicitors – which was raised as a concern in responses to the consultation.

Through LeO's Regulator Forums and direct meetings with the other frontline regulators we have been able to work collaboratively in our respective approaches to policy work on complaints and in implementing the LSB's Requirements, Guidance and Statement of Policy. This includes sharing emerging research findings with other regulators and sections of our guidance as we have drafted it. We engaged with LeO on our draft guidance to ensure that we identified any areas of duplication with the materials and toolkits they are producing alongside the model complaints resolution procedure.

We have worked closely with LeO in its development of the model complaints resolution procedure and were able to demonstrate our support for this by including it in our [consultation](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/?s=c) [https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/?s=c] as an area where we asked for views on it. We were also able to ask consumers and consumer organisations for their views on it during our [engagement programme](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf]. We have shared the detailed responses and feedback we received with LeO for it to continue to progress work in this area, which we will support.

We agree a model complaints resolution procedure could be a beneficial resource for bringing greater consistency and to help consumers know what to expect. We also agree with what the LSCP highlighted in its response to our consultation, that it is important it is informed by and tested with consumers as it is developed, in order to be most effective in improving outcomes.

We understand LeO is currently piloting the model complaints resolution procedure with firms and has posted further information about this on its website: [Model Complaints Resolution Procedure](https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/). [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/model-complaints-resolution-procedure/]. This also sets out its plans for a full consultation to take place in 2026.

The consumer organisations we spoke to through our engagement programme, many of which support people who may be vulnerable by their characteristics or circumstances, shared resources and examples of good and poor practice from their clients' experiences of solicitors. Examples were also shared by the consumers we engaged with directly.

Areas of good practice included examples of digitally-excluded consumers being provided with paper versions of a complaints procedure where it was required, and a solicitor offering a clear explanation of it at the same time. We also heard of a solicitor that suggested support for a vulnerable client at meetings from a trusted family member.



Areas of poor practice included examples of clients being reluctant to complain through fear of it impacting on their legal matter, clients referencing a power imbalance as a barrier to making complaints and clients demonstrating a lack of awareness and knowledge of how to complain.

We were able to reflect this insight in the new complaints handling guidance. Where helpful resources were shared with us, we were able to link directly to them in the new guidance.

We also reviewed resources from organisations outside of legal services for examples of good practice from a range of sectors including utilities, financial services, leisure and healthcare. This also includes engaging directly with the Public Services Ombudsman for Wales and the Complaints Standards Authority, that has published standardised resources like template complaints procedures and shared their experiences of developing and using these resources and the feedback they have had from users.

This engagement has informed our new complaints handling guidance and case studies and we have been able to share with LeO in developing its model complaints resolution procedure and other resources.

- v. understand the timeliness with which authorised persons resolve first-tier complaints to the complainant's satisfaction. This data should be appropriately contextualised and published in order to increase transparency about performance levels

We agree it is important that complaints are dealt with in a timely way and we explored this in our thematic review. Firms are required to respond to client complaints within eight weeks. In our survey, the majority of firms (97 per cent) – excluding those that received no or few complaints, told us they provided a final response to complaints, on average, within eight weeks, with 65 per cent stating that they did so within four weeks. Most firms in our thematic review interviews also told us that they provide a final response within eight weeks. However, in 15 of the 50 complaint files we received the response exceeded eight weeks.

Each year we collect and publish an [annual report on first-tier complaints](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/]. At an aggregate level the report includes the numbers of complaints firms receive, resolve and escalate to LeO, complaint types and trends by firm size. This is to help raise awareness of good complaint handling and help firms to improve their standards of service. It is also a key part of our [wider work on quality indicators](https://www.sra.org.uk/sra/research-publications/quality-indicators-legal-services-report/) [https://www.sra.org.uk/sra/research-publications/quality-indicators-legal-services-report/]. We do not currently collect data on timeliness as part of this exercise.

In our [consultation](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/?s=c) [https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/?s=c] on changing our requirements on first-tier complaints, we asked for views on collecting and publishing additional data on the timeliness of complaints resolution at firm level. This was directly informed by this LSB expectation.

The majority of consultation responses from the profession expressed concerns, including the risk of misleading impressions if the data was not contextualised adequately and doubts over the value of the information to consumers. Some respondents were supportive of us collecting the data but not publishing it.



The LSCP were supportive of the collection and publication of timeliness data to raise standards and help identify risks. It also suggested that we could improve the scope and accessibility of the complaints data we already collect and publish.

Consumers and consumer organisations we engaged with were generally supportive of there being public complaints data available in an accessible format, if it was reliable and trustworthy.

We therefore set out in our consultation [response](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-consultation-response.pdf) [\[https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-consultation-response.pdf\]](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-consultation-response.pdf) that we will start to collect data about how long it takes those we regulate to resolve complaints in 2026. This will enable us to understand and analyse it and use for regulatory purposes and monitoring compliance with the 8-week response time. We can then further explore how and whether to publish it. We will look to introduce the new data point for timeliness of complaints resolution in 2026. Ahead of this, we will give those we regulate detail on what data we expect them to collect, and when to start collecting it.

- vi. give particular consideration to legal services users with protected characteristics and/or who are in vulnerable circumstances, and take action accordingly

Through our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [\[https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/\]](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/), where we visited 25 firms and surveyed 750, we included a specific focus on how solicitors and firms are giving consideration to legal service users with protected characteristics and/or who are in vulnerable circumstances when handling complaints.

We found that approaches varied. Some had dedicated policies and training that were not always complaints specific. Some focused on making adjustments for people with physical disabilities, such as providing documents in large print on request. Some firms had not considered vulnerability at all as part of their complaints procedures or more widely regarding service provision.

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 from us and we were able to shape our new complaints handling guidance with this in mind.

We also drew on findings and recommendations from our [research into consumer vulnerability in the legal market](https://www.sra.org.uk/sra/research-publications/consumer-vulnerability-legal-market/) [\[https://www.sra.org.uk/sra/research-publications/consumer-vulnerability-legal-market/\]](https://www.sra.org.uk/sra/research-publications/consumer-vulnerability-legal-market/), using the guidance to share key messages and considerations for solicitors and firms.



We also engaged with consumers and consumer organisations for their views during our [engagement programme](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc---summary-of-feedback-from-engagement-programme.pdf]. Through these events, we sought to engage with people with a range of protected characteristics and/or who may be vulnerable due to their circumstances or situation to inform our policy development. We also engaged with people who are not digitally confident or who are digitally excluded. We reached out to organisations we have previously engaged with and also to new ones, to ensure the diverse voices of the people they represent were heard.

We have included a section in our new complaints handling guidance on accessibility and supporting vulnerable clients, which includes practical suggestions for how to make complaints procedures, and services more broadly, accessible. It signposts to helpful resources, including some that were shared with us by consumer organisations who support people who are vulnerable.

As part of our policy development, we also reviewed existing research that identified additional barriers for people who may be vulnerable by their characteristics or circumstances when raising complaints. These can be due to the area of practice or protected characteristics, for example immigration/asylum or people with a disability. We set out further information on this in our [draft equality impact assessment](https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/) [https://www.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/] and asked for views on this.

Alongside our consultation response we published a final [Equality Impact Assessment](https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-equality-impact-assessment.pdf) [https://www.sra.org.uk/globalassets/documents/sra/consultations/2025/ftc-equality-impact-assessment.pdf]. This identified that the changes we plan to proceed with will have positive impacts for consumers and vulnerable consumers, including some who may be vulnerable as a result of their characteristics.

We will monitor the impact of the changes we have made through our ongoing stakeholder engagement, compliance monitoring and evaluation exercises. For example, we will use key data from the [LSCP 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] to monitor the experiences of people who may be vulnerable by their characteristics or circumstances.

- vii. consider how authorised persons identify and address risks and issues arising from first-tier complaints in line with the section 112 Requirements and how they use this to improve the service they provide

Through our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/] we explored how solicitors and firms used insights from complaints to identify issues and drive improvements, from firm-wide systematic issues to learning and development needs for individuals. We reminded firms of the importance of recognising these to meet our continuing competence requirements and raise standards in the profession.

Many of the firms we engaged with recognised the commercial benefits of good complaints handling. Those that did, often recorded more detailed information. They had also developed sophisticated reports to identify trends and drive continuous improvement. Some identified and analysed the root causes of



complaints and used this information to inform training needs and improve processes.

Most of the firms we engaged with monitored complaints and used this data to try and identify trends, improve the delivery of legal services and manage risk. They approached how they did this in different ways. Some said they monitored complaints at a firm-wide level. Partners, Directors and/or the Board would receive monthly reports and complaints were often a standing item on an agenda. For example, if the data indicated that one department or team had a high number of complaints, they would explore the reasons behind this.

We found in smaller firms where one person was responsible for all aspects of complaints handling, it was not always practical to have formal monitoring processes. In such circumstances, we found that the person dealing with complaints generally had their own complaints log but this was not reviewed by anybody else.

The information solicitors and firms reported on also varied – some collected the data that they report to us that we publish annually at aggregate level in our [first-tier complaints annual report](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/1) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-2023/1], namely the number of complaints received, resolved and escalated to LeO. Other firms captured more detailed information such as the nature of the complaint, time taken to respond, fee earner and department involved.

Most of the firms we engaged with said that the data collected on complaints then influenced the nature, content or frequency of their firm's learning and development activity. For example, in response to a pattern of complaints one firm said they arranged training on how to empathise with clients, accept responsibility when things go wrong and how to respectfully push back when they felt the firm was not at fault. They said that the training helped when dealing with a complaint.

Some firms told us that they used insights from complaints to change how they delivered services. Examples of how included changing client information to manage expectations on how long it would take them to reply or introducing a case tracker.

Following a complaint, some reflected on how their complaints handling could be improved.

In our new complaints handling guidance we have included a section on learning and improvement which reminds solicitors and firms about our continuing competence requirements to keep their knowledge and skills up to date, including any relevant legal, ethical and regulatory obligations relevant to their role. This means they must reflect and identify, plan and address how they will address their own learning and development needs and record and evaluate on this. We have also included good practice tips within the guidance – highlighting that some are relevant for individual solicitors in managing their own learning and development and some are for those responsible for supporting their staff with complaints handling. These highlight the importance of monitoring complaints and learning from them, both at a systematic level and for individuals.



We will monitor this through our compliance monitoring and planned evaluation activity.

- viii. put in place proportionate and targeted measures to facilitate compliance by authorised persons with the regulator's regulatory arrangements on complaints procedures that implement the section 112 Requirements. In considering measures to adopt, regulators may wish to consider:
 - a. Best practice: promoting best practice in first-tier complaints handling, for example, by developing and giving guidance and case studies to authorised persons and/or other regulators as appropriate;

Informed by our thematic review, evidence gathering, consultation and stakeholder engagement, we have produced new complaints handling guidance which sets out the mandatory requirements on those we regulate as well as giving good practice tips. A [draft \[https://legalservicesboard.org.uk/wp-content/uploads/2025/10/Annex-4-Draft-complaints-handling-guidance.pdf\]](https://legalservicesboard.org.uk/wp-content/uploads/2025/10/Annex-4-Draft-complaints-handling-guidance.pdf) of the new guidance was submitted as an annex to our application to the LSB.

Alongside this, we will publish illustrative case studies from our thematic review into first-tier complaints handling and other thematic reviews.

The new guidance covers the following areas: identifying complaints, what information to give clients and when, handling complaints, communication, accessibility and supporting vulnerable clients, responding to and resolving complaints, learning and improvement, managing difficult situations in complaints handling, support for solicitors and external resources and further help.

An early draft of the guidance was shared with key stakeholders LeO and The Law Society for input. We have also shared draft sections of this guidance with other frontline regulators to help inform their approach, as well as sharing early findings from our evidence-gathering.

We have also worked closely with LeO in its development of a model complaints resolution procedure and other resources, sharing the feedback and insight we gathered as part of our consultation and stakeholder engagement.

- b. Training and guidance: identifying opportunities for ongoing training and development as part of their approach to ongoing competence;

As detailed in our response to the LSB's Requirement on learning and improvement above, we set out in our [Statement of solicitor competence \[https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/\]](https://www.sra.org.uk/solicitors/resources/continuing-competence/competence-statement/) that solicitors must keep their knowledge and skills up to date, including any relevant legal, ethical and regulatory obligations relevant to their role.

We expect them to reflect and identify, plan and address how they will address their learning and development needs and record and evaluate this.

Since 2023 we have published an [annual assessment of continuing competence \[https://www.sra.org.uk/sra/research-publications/annual-assessment-continuing-competence-2025/\]](https://www.sra.org.uk/sra/research-publications/annual-assessment-continuing-competence-2025/) and in 2025 we included complaints data in the development of this. We will continue to consider complaints data as part of this annual assessment and for 2026 explore how solicitors are incorporating learning from complaints into their learning and development.



In our new complaints handling guidance, we have included a section on learning and improvement. This sets out our mandatory requirements and good practice tips for both individual solicitors who are responsible for their own learning and development, and those also responsible for supporting staff with complaints handling within a firm.

We have highlighted the areas from the LSB requirements about implementing measures to identify risks or issues, including systematic issues and then undertaking training (for individuals) or providing support and training (when someone is responsible for staff handling complaints).

We have included areas where the solicitors and firms we engaged with through our thematic review and consultation responses asked for support such as accessibility and supporting vulnerable clients. Having clear guidance on these areas will help in their learning and improvement.

We have also published our [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/] which solicitors and firms can use as a helpful resource and in which we signpost to both SRA and external resources. We have been working closely with LeO in its development of resources like the model complaints resolution procedure.

- c. Reviews: carrying out thematic or targeted reviews of recurring issues or trends in complaints handling, with a view to implementing measures to address concerns identified and achieve better outcomes for consumers;

In light of the evidence we were seeing in our compliance monitoring, and from our stakeholders, we undertook a [thematic review of first-tier complaints handling](https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/) [https://www.sra.org.uk/sra/research-publications/first-tier-complaints-handling/].

As a result, we identified areas where we needed to strengthen our rules on complaints handling and be clearer to those we regulate on our expectations. These are set out in detail in our introduction to this response under the heading 'our consultation'.

All of our thematic reviews are undertaken as a result of evidence identifying a need to delve deeper into issues. This includes looking at data from first and second tier complaints.

We will continue to use this approach to monitoring issues and trends in complaints handling. As set out at the start of this response, we are also shifting our overall approach to regulation – using data and insight (including complaints data) to identify and act on issues early on.

- d. Supervision: carrying out supervisory interventions as required; and
- e. Enforcement: carrying out remedial actions, such as requiring training in complaints handling.

We have existing requirements in our Standards and Regulations setting out our expectations on those we regulate for complaints handling. We consulted on and have applied to the LSB to strengthen these requirements in some areas. To help solicitors and firms to meet our existing and strengthened proposed new requirements, we have produced new complaints handling guidance and case studies.



If approved by the LSB, we will publicise the changes and give those we regulate 3 months to implement them.

Following this, we will monitor compliance and take action where solicitors and firms are not complying. Our [enforcement strategy](#)

[\[https://www.sra.org.uk/sra/corporate-strategy/sra-enforcement-strategy/\]](https://www.sra.org.uk/sra/corporate-strategy/sra-enforcement-strategy/) sets out how we do this in detail and our approach to taking regulatory action in the public interest. In accordance with this, we monitor compliance with our existing requirements and would do so with any new requirements that are introduced.

An example of this is how we have monitored compliance with our Transparency Rules, as detailed in our response to the LSB requirement of 'Enforcement'.

Next steps

Throughout this response we have set out the work we have been doing, and will continue to do, to raise standards in complaints handling and improve outcomes for consumers in response to each of the requirements and expectations in the LSB's [Requirements, Guidance and Statement of Policy to regulators](#) [\[https://legalservicesboard.org.uk/our-work/lsb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules\]](https://legalservicesboard.org.uk/our-work/lsb-rules-and-guidance#First_Tier_Complaints_and_Signposting_Rules). This includes how we use our data and insight to identify thematic areas of weakness and trends and give consideration to people who may be vulnerable by their circumstances or characteristics. We have set out our approach to compliance and enforcement, and how we are changing our approach to regulation in light of increasing challenges and changes across the sector. A key part of this is by progressing our Risk and Data programme and this will include looking at how we use first and second-tier complaints data.

We have highlighted the existing requirements in our regulatory framework and our expectations on those we regulate for how they handle complaints. We have also highlighted the work we have done over the last year to review these, in light of evidence from our compliance monitoring and from our stakeholders that things could be working better.

We have applied to the LSB to make changes to our regulatory framework to strengthen our requirements. We also plan to publish new complaints handling guidance and case studies once we have the outcome of our application.

We will continue to monitor and evaluate the impact of our policy work going forward. This includes continuing to work with other frontline regulators and LeO to use data and insight to raise standards in complaints handling across legal services.