

# **High-volume consumer claims: Join the discussion**

# High-volume consumer claims

## What is a high-volume consumer claim?

- Where large numbers of consumers file claims against the same organisation, or in relation to the same issue
- Examples include: housing disrepair, data breaches, flight delays, diesel car emissions, motor finance commission and other financial services
- Can be a good route for consumers to enforce their rights

# Consumers are facing harm

- Clear evidence of consumer harm & detriment
- 76 live investigations
- Range of issues and concerns emerging from our investigations and thematic review

Wide-ranging issues and concerns

# What we're doing

- Ongoing investigations and enforcement
- 700+ firms asked to complete mandatory compliance declaration on claims work
- Range of dedicated guidance issued to firms & public
- Further materials to follow
- Working closely with others

## Call for input on five key challenges:

1

**Improving  
transparency  
and clarity for  
consumers**

2

**Managing risks  
around third-  
party litigation  
funding**

3

**Making sure  
after-the-event  
(ATE) insurance  
meets  
consumers'  
needs**

4

**Regulating a  
changing  
market**

5

**Delivering  
wider system  
improvements**

**Open for feedback until 14 November 2025**

# Discussion Paper - Challenges

## Challenge 1: Improving transparency and clarity for consumers

- Making information clearer, better explaining to consumers what they are signing up to, and making sure they are aware of the risks involved
- Rethinking how and when the term '**no-win, no-fee**' is used?

## **Challenge 2:** Managing litigation funding risks

- The litigation funding market is currently unregulated, with risks for firms and consumers
- What information on funding needs to be shared with consumers?
- How to better manage risks associated with litigation funding and monitor financial stability

**Challenge 3:** Does the way the ATE (after-the-event) insurance market works protect customers and meet their needs?

**Challenge 4:** Is poor compliance with our standards and regulations leading to consumer harm, and what could be done about this?

**Challenge 5:** Could consumer interests be better protected by the wider system, including areas beyond our remit?

# Join the discussion

- The high-volume consumer claims discussion paper is open until **14 November 2025**
- Events throughout the consultation period, including:
  - Two roundtables for the profession: 7 October and 6 November

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