Solicitors Regulation Authority

A thematic review of first-tier complaints handling

14 October 2025

Exective summary

Background

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

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

When clients are dissatisfied with a firm's service, they can raise complaints directly with the firm. These are known as 'first-tier complaints'. Law firms then have eight weeks from the date they receive a first-tier complaint to provide their final written response. If the firm is unable to resolve the complaint to the client's satisfaction, clients can then contact the Legal Ombudsman [https://www.legalombudsman.org.uk/media/ce4p0hjw/large-regulator-chief-executive-letter-annual-complaints-v10.pdf] (LeO). This is known as a 'second-tier complaint'.

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

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

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

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

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

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

What we did

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

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

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

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

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

Key findings

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

- Firms define complaints in a variety of ways. Only one interviewee said their firm used the LSB's full definition of a complaint[1][#n1]. Eleven interviewees said a complaint was often more of a judgement call and did not use a single definition. This variation was reflected in the survey responses and was an area where firms asked for further guidance.

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

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

Supporting vulnerable clients

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

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

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

Good practice

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

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

Next steps

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

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

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

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What we did

Our thematic review looked at:

- how firms identify and define first-tier complaints
- how firms handle complaints
- the extent to which firms learn from complaints, and
- firms' experiences of dealing with complaints.

We visited 25 firms. At each visit, we met with the person with overall responsibility for complaints (referred to as 'the interviewee' throughout this report) and reviewed two of their complaint files. In total we reviewed 50 complaint files. Where possible, we chose one complaint which had been resolved by the firm (known as first-tier complaints) and one which had been escalated to LeO (known as second-tier complaints).

We reviewed each firm's complaints procedure and any other relevant documentation available. We referred one of the interviewees to our Investigations team, due to concerns that they did not have an effective complaints handling procedure.

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 Compliance Officer (COLP) at each firm was required to provide information on how their firm identified and handled first-tier complaints.

743 firms replied to the survey (7 firms did not answer the questionnaire as they were either closed or in the process of closing). Firms that took

part are referred to in this report as 'survey respondents' where findings from that survey are included in this report.

More information about our methodology can be found in the 'Our approach' section at the end of this report.

At the end of each section of this report, we have included examples of good and poor practice. Links to further information and resources to help firms can be found at the end of the report.

In May 2025, we issued a consultation on changing our requirements on first-tier complaints. This included proposals to develop complaints handling guidance to support those we regulate to meet our requirements. This thematic review and survey will inform our policy development and guidance in this area. We have published our consultation response and next steps [https://beta.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/] alongside this report.

What we expect

All firms and solicitors must comply with our Standards and Regulations.

We set out the requirements relevant to our review below. The thematic review and survey were undertaken between January and March 2025, so relate to the Standards and Regulations as they were at that time. Our next steps and proposed changes to our requirements are set out in our consultation response [https://beta.sra.org.uk/sra/consultations/consultation-listing/requirements-ftc/] .

SRA Principles

Our Principles [https://beta.sra.org.uk/solicitors/standards-regulations/principles/] set out the fundamental ethical behaviours that we expect everyone to uphold. This includes:

- acting in a way that upholds public trust and confidence in the solicitors' profession and in legal services provided by authorised persons (Principle 2); and
- acting in the best interests of each client (Principle 7).

Codes of Conduct

Our Codes of Conduct set out the standards of professionalism we and the public expect of solicitors and firms. Our complaints handling expectations are outlined in paragraphs 8.2 to 8.5 of the Code of Conduct for Solicitors, RELs, RFLs and RSLs [https://beta.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/] (Code of

Conduct for Solicitors) and paragraph 7.1(c) of the Code of Conduct for Firms [https://beta.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/] .

Solicitors must:

- either establish and maintain, or participate in, a procedure for handling complaints in relation to the legal services they provide
- ensure that clients are informed in writing at the time of engagement about:
  - their right to complain to the firm about their 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 any such complaint.
- inform the client in writing, where the firm has been unable to resolve a complaint to the client's satisfaction within eight weeks:
  - of their right to complain to LeO, the time frame for doing so and full contact details; and
  - where the firm's complaint procedure has been exhausted and the firm cannot settle the complaint, clients should be provided with details of an appropriate alternative dispute resolution (ADR) provider and confirmation whether the firm agrees to use the scheme.
- ensure that complaints are dealt with promptly, fairly, and free of charge.

When delivering legal services, solicitors must also:

- ensure that the service provided to clients is competent and delivered in a timely manner (Code of Conduct for Solicitors, paragraph 3.2)
- undertake regular learning and development to keep their professional knowledge and skills up to date and to maintain their competence (Code of Conduct for Solicitors, paragraph 3.3)
- consider their client's attributes, needs and circumstances (Code of Conduct for Solicitors, paragraph 3.4).

Transparency Rules

Our Transparency Rules [https://beta.sra.org.uk/solicitors/standards-regulations/transparency-rules/] outline the information we expect firms and solicitors to make available to clients or potential clients. Rule 2.1 requires all firms to publish on their website details of their complaints handling procedure, including details about how and when a complaint can be made to either LeO and the SRA.

Recognising a complaint

Why this is important

The LSB defines a complaint as any expression of dissatisfaction, whether oral or written, which alleges that the complainant has suffered, or may suffer, financial loss, distress, inconvenience or other detriment.

At the time of this thematic review, we did not include the LSB's definition of a complaint in our glossary of defined terms, but we were interested in gathering views on this.

Recognising when somebody is making a complaint is important, but it is not always easy. Clients may not always use the word 'complaint'. Instead, clients may refer to being unhappy with the service provided, how their matter is progressing, or the time it took to reply to an email.

Being able to identify when someone is expressing dissatisfaction is important to make sure complaints are identified, handled and dealt with consistently. Identifying a complaint also helps make sure that a client is then provided with the right information about how their complaint should be handled. It is important that firms can identify issues so that any lessons learned can be applied and those issues do not continue to arise.

It is also important that all complaints are acknowledged, investigated and a final response provided. If unresolved, it is important clients are signposted to LeO.

What we found

Defining a complaint

The evidence gathered from our survey and our visits show that firms currently define complaints in a variety of ways.

We asked survey respondents which of the following their firm would identify as a complaint and received the following responses:

- When someone makes a formal written complaint (92 per cent)
- An expression of dissatisfaction in writing, including by email (75 per cent)
- When someone tells the fee earner that they want to make a complaint (70 per cent)
- An expression of dissatisfaction (54 per cent)
- An expression of dissatisfaction verbally to other client-facing staff (45 per cent)
- An expression of dissatisfaction through other media, such as text or messaging apps (46 per cent).

Only one interviewee said the firm used the LSB's full definition of a complaint. Twelve interviewees adopted a partial LSB definition and defined complaints as 'an expression of dissatisfaction'. The remaining

11 interviewees did not use a formal definition. For them, what amounted to a complaint was often a judgement call.

If a concern was minor, straightforward or could be resolved quickly, then it was less likely to be recorded as a complaint. Deciding whether something amounts to a complaint by looking at the outcome risks failing to properly identify, deal with, and learn from that complaint. This approach also fails to recognise the impact even minor issues can have on clients. It risks client concerns not being taken seriously, resulting in minor issues being repeated. This could negatively impact the trust and confidence placed in the profession.

Recording all complaints, even if you consider them to be minor, helps firms to recognise trends. It also helps firms to learn from them or use them to improve customer service. This is explored further in the 'Insights from complaints data' section below.

Several interviewees and survey respondents referred to 'informal complaints', which would not be dealt with under the firm's complaints procedure. Views on what the term 'informal complaint' meant, and if firms recorded them varied. To some it meant a complaint which had been made informally i.e. made in passing. Overall, responses to our survey showed that expressions of dissatisfaction made verbally were less likely to be considered a complaint, compared to those made in writing.

A small number of survey respondents said that if an expression of dissatisfaction was about customer service, then they would not treat it as a complaint. They said that they would only treat expressions of dissatisfaction about legal work as a complaint. However, firms should remember that LeO deal with service-related complaints, therefore it is important that they acknowledge and record all complaints about customer service.

The way in which a complaint is made or the issue it raises should not determine whether it is recorded and dealt with under a firm's complaints procedure.

We asked interviewees who did not use a definition of a complaint how they made sure all staff were approaching complaints in the same way. Interviewees mentioned several methods including:

- Providing internal guidance and examples on what might constitute a complaint.
- Discussing complaints during induction and at regular intervals. Most interviewees said it was important that all staff have knowledge of the complaints procedure as a complaint could come at any time in the client journey.
- Checking during monthly file reviews whether the client had expressed any dissatisfaction and how the fee earner had

responded.
- Calling a random selection of clients to see whether they expressed any dissatisfaction and how this was handled.
- Providing additional training on complaints to managers and team leaders to enable them to support fee earners or deal with a complaint.

Sixteen interviewees told us they used online resources provided by LeO to help inform the way they handled complaints. For example, LeO's guidance on best practice complaint handling [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/good-complaints-handling/] , including their approach to putting things right [https://www.legalombudsman.org.uk/media/4ipfnx2m/201201-external-remedy-guidance-refresh-1.pdf?portfolio=guidance-our-approach-to-determining-complaints] and case studies. These firms told us that they would often use these resources as the basis of a training session. LeO's case studies and guidance were particularly useful to sense check whether the firm's decision aligned with LeO's decisions.

If it is not clear whether a client is complaining, firms ought to be cautious and record it as a complaint. Or, as some interviewees told us, they would ask the client whether they wanted to make a complaint.

Automatically dealing with some issues as complaints

A few interviewees said that if allegations of professional misconduct, discrimination or negligence were raised, these would immediately be dealt with as complaints. As these were serious allegations, firms felt it would be inappropriate for a fee earner to try and resolve these types of issues themselves. It was also important for line managers and senior managers to be aware of such allegations. They could then be properly investigated and a full response given by the firm. It also helped maintain a level of independence in the procedure.

Solicitors are reminded of their personal obligation to report to us any facts or matters they reasonably believe are capable of amounting to a serious breach of our regulatory arrangements. Where appropriate, firms should also consider signposting clients to us.

Barriers to making a complaint

Survey respondents were asked what they thought might stop clients from making a complaint. The most common reasons given were thinking that it might:

- affect their relationship with their solicitor (52 per cent);
- delay their case or take too long (39 per cent); or
- affect the outcome of their case (36 per cent).

Firms we visited told us that they would be open to receiving complaints in several ways:

- Verbally, by phone or in person. The complaint did not necessarily have to be made to a fee earner, it could be logged by support staff or somebody working in a centralised complaints team.
- In writing, by email or post. A complaint could be directed to anybody in the firm.
- Completing a specific complaint form available on the firm's website.

Overall, interviewees felt that there was little to prevent clients from making a complaint. A few referred to 'silent sufferers' – a term used by interviewees to describe clients who want to make a complaint, but for various reasons do not feel able to. Reasons we heard included:

- having no confidence in the fairness or independence of the complaints procedure;
- worrying their complaint won’t be taken seriously especially as they are complaining about a legal professional; or
- thinking that a complaint might negatively impact their legal matter.

It is important that firms and their staff reassure clients if they have these concerns.

Firms should also make sure there is a complaints procedure in place which is easy to find, understand and use. Firms should also make sure their complaints procedure is accessible. Some examples that interviewees provided, included:

- Referring clients to LeO's complaint letter template. This helps clients set out their complaint, the impact it has had and the remedy they want.
- Accepting complaints in a range of formats and not insisting on complaints being made in writing.
- Accepting 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. All interviewees said they would be willing to do this.
- Offering a face-to-face meeting to provide an opportunity to better understand the nature of the complaint.
- Making sure that the complaints procedure is in a prominent position on the firm’s website. For example, not including it in small text at the bottom of a webpage that is not the homepage or requiring clients to click through several pages to locate it.
- Using different text colours and layouts which could help the accessibility and readability of complaints procedures.

- Using a flow chart to clearly explain each stage of the complaints procedure.

Identifying potential complaints

Eighteen interviewees said they proactively try to identify concerns and complaints from additional sources.

They did this by looking at client feedback forms and online reviews to see whether a client expressed any dissatisfaction. If they did and the firm could identify the client, the firm would then contact the client directly to discuss the issues they had raised. Trustpilot, Google reviews and ReviewSolicitors were some of the online review platforms that interviewees mentioned engaging with to do this. Interviewees told us that some websites provide free alerts to let them know automatically when a new review is published. The firm can then consider the review and respond.

When we asked interviewees how they would respond, some would reply with a generic response which would not acknowledge any of the issues raised but would invite the poster to contact them directly with further information.

When a review was perceived to be 'fake', some told us they would not engage with or respond to it.

We know that an increasing number of clients read reviews before deciding to instruct a firm. It is important that firms know what clients are saying about them and respond appropriately where possible.

We have published guidance on how to engage with online reviews [https://beta.sra.org.uk/solicitors/resources/fees/engaging-online-reviews/] while maintaining your professional obligations, such as maintaining client confidentiality and the duty to act in a way which upholds public trust and confidence. We recommend that you respond to all reviews, particularly negative ones, whether you agree with the validity or accuracy of the comments that have been published or not. Firms should also consider responding by setting out a route as to how an issue can be resolved, for example by making a complaint.

Case study – using technology to identify potential complaints

Firm A experienced a sudden increase in the number of complaints it received. These complaints were primarily about failing to update the client or a delay in progressing a matter and had occurred because the firm was experiencing staff shortages. A few of the complaints also related to the delay clients were experiencing in the firm dealing with the complaint itself.

The firm was already using technology to scan incoming post and emails and decided to use this to try and detect when clients may be becoming dissatisfied. The system scanned for words such as 'unhappy', 'delay', 'apology', 'frustrated'. A line manager then reviewed the correspondence to establish if a complaint should be recorded, or whether there were steps which could be taken to recover the client relationship without them having to make a complaint.

The firm found that early engagement with clients who were starting to become dissatisfied helped the firm manage the number of complaints they received about failing to update the client or a delay in progressing a matter. It also gave the firm time to deal with existing complaints and respond to complainants in a timely manner.

Complaints from beneficiaries

Complainants are not always clients of the firm. Under its Scheme Rules [https://www.legalombudsman.org.uk/media/oughytel/scheme-rules-april-23-final.pdf] , LeO can accept complaints from beneficiaries so long as it relates to services provided to the complainant.

All interviewees told us that where possible, they would deal with a complaint from a beneficiary. We heard how sometimes that might be difficult if the executor does not consent to disclosing confidential information to the beneficiary. If a firm decides not to respond to a complaint from a beneficiary, we recommend keeping an attendance note setting out the reasons for this. Dealing with complaints from beneficiaries was also raised in responses to our survey as an area where respondents would like more guidance.

One interviewee shared an example of how they used an external third party to support them in handling complaints from beneficiaries of an estate they were acting for.

Case study – maintaining the firm’s independence while dealing with a complaint

Firm B acted for the estate of a person who had died. The firm received two complaints, one from each of the two beneficiaries who disagreed with each other. Due to the complex nature of both complaints, the firm was concerned about its ability to investigate both complaints objectively and impartially. The firm also wanted to make sure it met its own obligations towards its client (the estate) and avoid the potential of inadvertently disclosing confidential information.

The firm, therefore, decided to use an external third party to help investigate and provide a response to both complaints. Before doing so, it sought the permission of both complainants and explained that they would not be charged.

The firm felt this helped it to handle and respond to the complaints effectively while maintaining its independence

Complaints from independent resolution service providers

Independent resolution services typically help facilitate the process of making a complaint, but do not act on behalf of the complainant or take control of the complaint. We know that some clients find these services a useful tool in being able to raise a first-tier complaint.

Almost all interviewees had no experience of receiving complaints via independent resolution services but said they would be willing to engage with these organisations if they did. Forty per cent of firms that responded to our survey said they would engage with one of these organisations if led by the client, and it was something the client had chosen.

Before doing so, firms should make sure that the independent resolution service provider is not seeking to take advantage of the person making the complaint as we have also seen examples of this. Clients should be made aware that they can raise a complaint themselves, free of charge, without the need for third party involvement.

Case study – protecting a client's best interests during a complaint

Firm C was contacted by a commercial company on behalf of a client who wanted to make a complaint. In return for raising the complaint and acting on behalf of the client, the company wanted payment from the firm. The company would also take a percentage of any award made to the client. The firm refused to engage with the third party until they had checked the position with the complainant. The firm contacted the client directly to explain the firm's complaints procedure and the role of LeO. The firm also reassured them that they would not be charged by the firm for dealing with the complaint. The client was grateful for the firm's intervention and chose to raise their complaint directly with the firm. The firm, therefore, upheld our Principles of acting with integrity and in the best interests of the client.

Good practice

- Recognising when a client wants to or intends on making a complaint. If you are not sure, ask the client whether they want to make a complaint and signpost to your complaints procedure.
- Offering clients several ways to make a complaint so they can then make it in a way which best suits them.
- Publicising and providing clear information about the complaints procedure so that those who want to complain feel able to.

- Considering whether a client needs additional help and support throughout the complaints procedure.

Poor practice

- 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 your 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

Why this is important

Clients have the right to complain if they are unhappy with the service they have received from their solicitor or firm. It is important that clients are made aware of the firm's complaints procedure, and their concerns are taken seriously, investigated and responded to appropriately.

Good complaints handling can help to increase client confidence, minimise future complaints and help to improve services.

If a complaint is escalated to LeO, consideration will also be given to how the firm handled the matter at first-tier. LeO currently charge firms a case fee of £400 for investigating complaints. Rule 6 of LeO's Scheme Rules [https://www.legalombudsman.org.uk/media/oughytel/scheme-rules-april-23-final.pdf] sets out the circumstances where the case fee can be waived. Where the firm's complaint procedure was not followed, LeO are unlikely to waive the case fee, even if the complaint itself is not upheld (Rule 6.2(b)).

What we found

Making clients aware of the complaints procedure

All interviewees and most survey respondents (99 per cent) told us they had a complaints procedure. Two survey respondents felt it was unnecessary to establish a complaints procedure on the basis that they had never received a complaint. This approach fails to recognise the importance of ensuring that clients are aware of their right to complain. It also fails to meet the complaints handling expectations we set out in our Code of Conduct for Solicitors.

We were interested in when firms informed clients about how and when they can complain. All interviewees and most survey respondents (95 per cent) told us that clients were notified in writing at the outset of a matter. For example, in the client care letter and/or the firm's terms and conditions. In addition, most interviewees (22) and survey respondents (68 per cent) told us that they would provide clients with the firm's complaints procedure if a client said they wanted to make a complaint.

Twelve per cent of survey respondents said they informed clients about how to complain at the end of the legal matter.

Reviewing complaints procedures

We were interested in how often interviewees reviewed and updated their complaints procedures. Most interviewees (19) told us that they had updated their complaints procedure in the last 12 months. Only one interviewee told us that they had never updated their complaints procedure.

It was common practice for interviewees to review all policies and procedures annually. Some interviewees also updated their complaints procedures on an ad-hoc basis. For example, following a change to LeO's address or time limits for accepting complaints, in preparation for an audit or following a change in the responsibility for complaints handling. The motivation for updating complaints procedures appeared to be mainly administrative, with limited consideration about how the procedure could be improved.

Complaints procedures

We found that interviewees' complaints procedures varied in complexity and accessibility. Complaints procedures also varied in how prominently they were presented on a firm's website and were not always easy to find. For example, appearing in small font at the bottom of a webpage that was not the homepage or embedded within a pdf document. Most procedures we reviewed explained what would happen at each stage (24), set out the timescales (20), and included a dedicated point of contact (22).

Although no interviewees charged for the time taken to deal with a complaint, only a small number specified this in their procedure. Similarly, while legal services should not be adversely impacted by a client making a complaint, very few interviewees explained this in their procedure. It can be helpful to address any clients' concern by including this information in complaints procedures.

All the procedures we reviewed included information about a client's right to escalate a complaint to LeO. Most procedures reflected changes to LeO's contact details and timescales which came into effect over a

year before our visits took place. We were, therefore, concerned to find that four firms who told us that their complaints procedure had been updated in the last 12 months, provided out of date information.

Most interviewees (18) included information in their procedure about how, and/or when a complaint could be made to the SRA. This must be published on a firm's website under Rule 2.1 of the Transparency Rules.

Many complaints procedures included an attempt to deal with client concerns informally. For example, dealing with the complaint during a telephone call or by email, before escalating to a full investigation and formal response. Ninety-one per cent of survey respondents with a complaints procedure also included an attempt to resolve client concerns informally.

Subsequent stages in complaints procedures generally included a formal acknowledgement, investigation and a final written response. Ninety-five per cent of survey respondents with a complaints procedure also said they acknowledged a complaint within a specified timeframe.

Some interviewees offered optional virtual or in-person meetings with clients to discuss their concerns and agree a way forward. While interviewees felt this helped them to understand and resolve issues quickly, they said that in practice, clients appeared reluctant to participate. Interviewees acknowledged that clients may feel concerned about a power imbalance, or that they would be encouraged to withdraw their complaint or accept a resolution they were not happy with.

Twenty-four per cent of survey respondents with a complaints procedure required a face-toface meeting to progress a complaint. While we recognise the benefits of meeting to discuss the complaint, we also understand the reluctance of some clients to attend. We would, therefore, discourage firms from requiring a meeting in order to progress a complaint. Good practice is being adaptable in how you accept complaints.

Some procedures we reviewed had additional stages, such as an internal review if a client was unhappy with the initial decision made by the first person investigating the complaint. This was also cited as something offered by 73 per cent of survey respondents that had a complaints procedure.

Including too many stages may be confusing for clients and could make it harder for a firm to provide the final response within eight weeks. We saw examples of this during our review of the complaint files. It is good practice to keep the process as clear and simple as possible. Firms should take steps to ensure that staff are aware of the procedure, and that decision making is consistent. This is particularly important where the responsibility for different stages is shared, for example by different teams.

It is good practice to keep complaints procedures simple and ensure that the stages and timescales are clearly explained.

Following client feedback, one interviewee had recently reduced the number of stages in their complaint procedure. They felt that reducing the number of stages from three to two made the process simpler and clearer for clients. This change also enabled the firm to shorten the time taken to provide a final response.

Who deals with complaints

Interviewees and survey respondents generally assigned responsibility for complaints handling to partners, compliance officers or internal compliance teams. In addition, survey respondents told us that it was common practice for fee earners to initially deal with complaints.

Interviewees explained that it was important that the person with responsibility for dealing with complaints holds a senior position in the firm and has the authority to make decisions. Complaints handling experience and an understanding of the practice areas concerned were also considered important attributes. Impartiality was also an important consideration. Although fee earners sometimes attempted to deal with client concerns informally, they rarely investigated complaints about themselves. We consider this to be good practice but recognise that it is not always possible. For example, sole practitioners may have no alternative but to investigate complaints about themselves.

Interviewees emphasised the importance of having sufficient resources to investigate and respond to complaints. Some smaller firms where one person was responsible for all aspects of complaints handling, told us this was particularly challenging.

Timescales in the complaints procedure

Firms are expected to respond to client complaints within eight weeks. We were, therefore, interested in interviewees and survey respondents' average response times to complaints. Some survey respondents had received no, or too few complaints to answer this question. The findings were broadly similar for interviewees and those survey respondents who had received sufficient complaints. Most survey respondents (97 per cent) and interviewees (23) told us that, on average, they sent a final response within eight weeks. Many survey respondents (64 per cent) and interviewees (16) told us that they generally responded within four weeks.

This approach was reflected in interviewees' complaints procedures. While most interviewees included their own, shorter timescales for responding, a small number had published timescales which exceeded eight weeks. We reminded interviewees of the expectation to respond to

complaints within eight weeks. However, the timescales provided by the interviewees were not necessarily reflected in the files we reviewed. This is explored further in the ‘firm responses to complaints’ section.

In addition, 40 per cent of interviewees were aware of at least one complaint response which had exceeded eight weeks in the previous 12 months. Factors which contributed to delayed responses included the complexity of the complaint, staff absence, and where firms needed to liaise with a third party to resolve a complaint. For example, some complaint responses were delayed whilst firms were required to wait for a response from their professional indemnity insurers before providing a final response. We acknowledge that this is a challenge for firms. It is good practice to manage clients' expectations about potential delays.

An example of poor practice we saw involved an interviewee who told us that despite being able to respond to a complaint, the firm would sometimes delay providing a response. They said that this was to try and make the client lose patience with the complaints procedure. We addressed our concerns directly with the interviewee.

Small firms, where one person was responsible for all aspects of complaints handling, were more likely to experience resourcing issues. We also heard of delays being caused by fee earners failing to report, identify or recognise complaints. This emphasises the importance of creating a culture where fee earners are not afraid of reporting complaints, and ensuring staff are appropriately trained and aware of the procedure.

Case study – timescales

We reviewed a complaint file where firm D had taken sixteen weeks to send a final response. The firm did not uphold the complaint at first-tier and provided the client with a detailed explanation. The client escalated the matter to LeO before receiving the firm’s response. LeO agreed with the firm and did not uphold the client’s concerns. However, due to the delay in responding to the complaint and failure to update the client, the firm was required to pay the client a remedy of £100 as well as LeO's case fee.

We reminded the firm of the importance of dealing with complaints promptly and responding within eight weeks. We also advised the firm that clients who have not received a complaint within this period are entitled to escalate the matter to LeO.

Firm responses to complaints

When reviewing files, we considered whether interviewees had handled the complaint in accordance with their procedure. We found that 29 complaints were handled in accordance with their complaints procedure.

In some cases, although a final response was sent within the published timescales, stages of the procedure, such as acknowledgments or offers of client meetings were missed. In other examples there was a delay to the published timescales. We found that a final response was sent within eight weeks on 35 files.

Some delays were outside the control of interviewees. For example, where a third party had submitted the complaint and the firm were awaiting client consent, or further information had been requested from the client, and no response had been received. In other cases, the interviewees contacted clients to explain the situation and manage expectations.

We identified a small number of files where the interviewees had failed to recognise, investigate or send a final response to a complaint. Failure to address complaints is poor customer service. It can undermine the reputation of the firm and diminish trust and confidence in the profession.

We also considered the quality and tone of responses. Some interviewees used the response to set out the full history of the matter. This was not always relevant to the client's specific concerns and sometimes led to unnecessarily lengthy and complicated responses. Responses were also complicated where the interviewees attempted to address other issues. For example, one interviewee had used the complaint response to explain that they would no longer be acting for the client. Although the decision to withdraw was not related to the client’s complaint, this was not clear from the response. We also saw some very brief responses, where the rationale for the interviewee’s conclusion was unclear.

It is good practice to keep responses simple and concise while ensuring that the client’s specific concerns have been addressed, and any conclusions have been clearly explained.

The tone of responses in the files we reviewed also varied. We saw some instances of defensive or dismissive tones and use of legalistic language. This is poor practice and may result in a client feeling as though their concerns have not been taken seriously. Clients may be more likely to escalate their complaint to LeO if they feel that they have not been heard. Some of the good responses we saw adopted a neutral or empathetic tone, even where the complaint was rejected, and avoided legalistic language.

We were also interested to understand what information about LeO was provided in the final complaint responses we reviewed. We found in:

- 28 files the client had been told of their right to escalate the complaint to LeO;
- 25 files the client had been told of the time limit for making a claim to LeO; and

- 18 files the client had been provided with details on how to contact LeO.

We require firms to provide this information in writing, if a complaint has not been resolved to the client's satisfaction within eight weeks. In addition, in accordance with Rule 4.4 of LeO's Scheme Rules [https://www.legalombudsman.org.uk/media/oughytel/scheme-rules-april-23-final.pdf] , time limits for accepting complaints only apply if the firm's written response includes this information.

Remedies offered

We were interested in the remedies offered by firms to try and resolve complaints. Interviewees and survey respondents told us that they offered a range of remedies, which frequently included apologies or financial gestures. Other remedies offered included rectification of work, return of documents, charitable donations, changing the person working on the matter and agreeing to progress a matter within a specified timescale.

We asked interviewees which remedies they found to be most effective and why. Most interviewees stated that apologies were most effective, as it demonstrated to clients that their concerns had been taken seriously. Financial awards, including compensation or a reduction/refund of fees were also considered to be an effective remedy. Firms felt that there is often an expectation that resolution of the complaint will include a financial award.

We also asked interviewees how they identified an appropriate remedy. Some interviewees asked clients what they wanted. Others based the remedy offered on what they thought the client was likely to accept or what they had previously offered in similar circumstances. It was also common practice for interviewees to consult LeO's guidance on putting things right to establish what they would be likely to award. Seventy-four per cent of survey respondents said they would consider LeO's guidance on appropriate remedies when deciding on the outcome of a complaint.

Some interviewees factored in the cost of the case fee. One of the interviewees had adopted an approach of offering most complainants a reduction in fees, on the basis that it was more cost effective than investigating the complaint. It is important to consider each complaint on its merits, rather than adopting a uniform, financially driven approach.

Additional support for vulnerable clients

It is important that firms take steps to identify and support potentially vulnerable clients who want to complain. Clients may be vulnerable because of their characteristics, circumstances or additional support needs.

We found significant variation in interviewees' and survey respondents' approaches to vulnerability. Some interviewees and survey respondents did not appear to have considered vulnerability, whereas others had dedicated policies and training in place (although this was not always specifically related to complaints). Most survey respondents also offered in person meetings (72 per cent), provided clear explanations that are easy to understand (62 per cent) or allowed the client additional time to reflect on a firm’s response or decisions (57 per cent).

Interviewees and survey respondents also offered alternative options or support tailored for people with physical disabilities, for example providing correspondence in large font or braille.

Some of the good practice we saw involved interviewees and survey respondents adapting communication to the needs of the client. For example, speaking to a client to ensure that the client had understood and was able to ask questions and tailoring written communication to the needs of the client. Some survey respondents were open to clients seeking support from a friend or family member who could advocate on their behalf (64 per cent). A few also stated that they offered home visits, where appropriate.

One of the interviewees was in the process of reviewing their service provided to clients and considering what additional steps could be taken to support vulnerable clients. This is an area where interviewees and survey respondents stated they would welcome further guidance.

Case study - additional support

Firm E noticed that when they responded to complaints, they would often refer to information contained in client care letters. Firm X realised that clients were given a lot of information in the client care letter, but it was not always provided in the most user-friendly way. If the firm could make the client care letter more accessible to clients, then this could help reduce the number of complaints they received.

To make this information more accessible, the firm created a series of short videos, to explain key aspects of the matter in a simplified and accessible format. The firm monitored usage of the videos and had the capability to translate the content into any language. Access to the videos was provided to all clients alongside the client care letter, at the start of the matter. In addition to supporting potentially vulnerable clients, the firm identified a reduction in the number of complaints they received.

The fact that the firm was analysing and learning from complaints is positive, as this enabled them to use client feedback to improve the quality of their service and the client experience.

Challenges for firms

Interviewees told us that dealing with complaints can be challenging.

Most interviewees (21) referenced the time it takes to deal with complaints. Investigating complaints could take longer if the fee earner who dealt with the matter had left, or the matter was lengthy or complex. This emphasises the importance of recognising and dealing with complaints at an early stage. Interviewees who deal with complaints as well as fee earning said this could be challenging. Firms should ensure they are prepared and resourced for this.

Interviewees said it could be challenging dealing with complaints where a delay had been caused by a third party such as the Land Registry, the Probate Office or the courts. This was because a firm could not resolve the complaint in the way or timeframe the client wanted. It remains a firm’s responsibility to manage client expectations, explain what steps they are taking to progress a matter and keep the client updated.

Interviewees perceived a change in the tone of complaints in recent years, with some linking this to the Covid-19 pandemic. Interviewees pointed to an increase in rude, threatening or abusive language used by clients, and provided the following examples:

- A client may be stressed because of their legal matter. For example, the stress of buying or selling a property, or getting a divorce.
- Clients having unrealistic expectations. For example, expecting to ‘win’ in litigation when compromise was likely, even after the firm had explained why, or thinking they could contact fee earners or their family members on social media outside of office hours.
- Social media normalising rudeness and the expectation that goods/services should be available instantly.

This could make investigating and resolving a complaint challenging. Interviewees emphasised the importance of managing expectations and ensuring that staff had received appropriate training. In extreme examples, interviewees addressed these issues by adopting zero tolerance policies and in some cases reporting clients to the police. Firms should ensure that staff are appropriately trained and supported. We have published guidance to help firms support the mental health and wellbeing of their employees. This is an area where interviewees said they would welcome further guidance.

Some interviewees felt that the influence of online misinformation had also contributed to a wider change in the motivation for complaints. They said that this had resulted in an increase in what some interviewees referred to as 'tactical complaints'. They intended this to mean clients making a complaint to achieve an outcome, when they were not in fact dissatisfied with the firm's service. For example, firms told us of clients

making complaints because their estate agent had told them it would speed up the conveyancing procedure.

We also asked survey respondents what their concerns were when handling complaints. Common concerns included unrealistic client expectations about their case or the process (43 per cent) and difficulties identifying when a client is expressing dissatisfaction that may turn into a complaint (24 per cent). Some survey respondents also had concerns about restrictions put in place by their insurers (17 per cent).

Potential business risks and benefits

Interviewees told us that good complaints handling can also create business benefits. Interviewees recognised that clients who were satisfied with the firm's handling of the complaint, were more likely to re-instruct the firm in the future or recommend them to others.

Interviewees also told us that clients were less likely to escalate their complaint to LeO if they felt that their concerns had been taken seriously and they understood the rationale for the firm's response. This resulted in significant time and cost savings for firms. For example, one interviewee told us they asked all clients for feedback at the end of a matter and introduced a target for fee earners to receive at least three online reviews a month. They stated that proactively requesting client feedback helped the firm to identify and resolve issues, improve customer service and reduce complaints.

Similarly, if clients have a poor experience this can damage the firm's reputation. This was an especially important consideration for interviewees from smaller firms, who typically acted for clients based locally or who were personally known to fee earners. They stated that dealing with a complaint well meant that the client was more likely to instruct the firm in the future.

Good practice

- Clearly setting out the complaints procedure, including the stages and timescales involved.
- Giving clients the option to meet with the firm in a way that is appropriate for them, to discuss their concerns - although this should not be compulsory.
- Complaints procedures should be accessible, and clients should be able to raise a complaint in a way suitable for them – not mandating that it must be in writing.
- Making it clear that a complaint will not impact a client's legal matter, and that they will not be charged.
- Acknowledging complaints promptly.
- Keeping complaint responses concise, using accessible language and ensuring that all issues raised by the client have been

addressed.
- Ensuring that client concerns are taken seriously, and the tone of responses is appropriate.
- Apologising where appropriate, including apologising that someone has felt the need to complain.
- Reviewing complaint responses to check all LeO information is provided and up to date.
- Signposting clients to LeO template letters, and the remedies which LeO can offer to manage their expectations.
- Providing regular training and support to staff, including dealing with difficult situations.
- Reviewing your complaints procedure regularly to make sure it remains up-to-date, reflecting changes such as LeO contact details or timeframes.

Poor practice

- 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

Why this is important

Complaints can give firms useful insight into how teams and individuals are delivering legal services. Data and information from complaints can help identify issues and drive improvements within a firm. These could be firm-wide systemic issues or learning and development needs for individuals.

It is important to recognise these to meet our continuing competence requirements and raise standards in the profession. It is important not only to focus on upheld complaints. Patterns in rejected complaints may suggest ideas where processes could be improved or there is more to do to improve client communication and satisfaction.

What we found

Monitoring complaints

Each year, firms must report to us the number of first-tier complaints they have received, resolved and escalated to LeO. We also ask firms to categorise the complaints they have received. This helps inform us about how organisations are performing in relation to first-tier complaints handling and build an evidential base which we use to monitor compliance.

We were, therefore, interested in what information firms were recording, and how they used this data. Most interviewees monitored complaints and used this data to try and identify trends, improve the delivery of legal services and manage risk. We found that interviewees approached this in different ways.

Twenty-two interviewees said complaints were monitored 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 explore the reasons behind this.

Understandably, it was not always practical for interviewees to have formal monitoring processes, for example in smaller firms where one person was responsible for all aspects of complaints handling. 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 interviewees captured and reported on also varied. Some interviewees limited this to high-level data we require. Other interviewees captured more detailed information, including the nature of the complaint (21), time taken to respond (12), and the fee earner (17) and department involved (16).

One of the interviewees had added a time recording code for dealing with complaints on their case management systems to calculate the cost to the firm.

Interviewees that recognised the commercial benefits of good complaints handling, often recorded more detailed information. They had also developed sophisticated reports to identify trends and drive continuous improvements. For example, some interviewees identified and analysed the root causes of complaints and used this information to inform training needs and improve processes.

Learning from complaints

We asked interviewees what they thought was important to clients in terms of service delivery. The most common answers given were responding to queries swiftly, progressing the case promptly, and providing regular updates on progress to date.

What we found in the complaint files we reviewed demonstrated the importance of these areas:

- 27 files of complaints raised issues of delay or a failure to progress;
- 18 files of complaints were to do with costs being excessive or deficient costs information, and
- 13 files of complaints were to do with a failure to keep the client informed.

Most interviewees (14) said that 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 interviewee said the firm 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. The training helped when dealing with a complaint.

After a complaint was received, interviewees told us that it was common practice for feedback to be provided to the fee earner involved (23), their line manager (11) and the head of department (12).

Complaints received might also be discussed at a team meeting. Some interviewees said that complaints data was used as a measure in individual annual performance reviews.

At departmental or team level, managers would initially consider the reasons behind a complaint. It could be a team-wide issue or one that related to a specific fee earner. Managers would then decide on appropriate training. For example, training might be delivered to entire teams or firm-wide, if there had been an increase in complaints about keeping clients updated or difficulties investigating complaints due to inaccurate attendance notes.

One interviewee said the firm had several complaints from clients who had received higher than expected bills. While an initial cost estimate was always provided, the fee earner had not always provided the client with an updated estimate of costs as the matter progressed. The firm acknowledged that this was a breach of paragraph 8.7 of our Code of Conduct for Solicitors. Fee earners who had failed to provide updated cost estimates were required to attend mandatory training. To avoid the likelihood of future issues, the firm set its case management system to automatically email the fee earner when costs reached 75 per cent of the initial estimate.

Using complaints to implement change

Some interviewees told us they used insights from complaints to change how firms delivered services.

One interviewee told us about how their firm now provides information on their website about how long it should take the firm to reply to the client. For example, a client can expect to receive a reply to an email within 2 working days. The interviewee told us the firm had done this to help manage client expectations. This helped reduce the number of complaints about failing to keep the client informed.

Another interviewee had introduced a live case tracker which enabled clients to monitor the progress of their matter. The tracker used a traffic light system to make it clear to a client when they were waiting for a fee earner to act to progress the matter. As a result, the firm received fewer update requests from clients, which enabled the fee earners to focus on progressing the legal matters.

Case study – first time buyers

Firm F identified a pattern of complaints from first time buyers about the time taken to purchase a residential property. Although the firm provided clients with information about the stages in a conveyance and estimated timescales, first time buyers did not always understand whether their matter was complex and so might take longer than anticipated.

The firm decided to create a table outlining the differences between a simple conveyance and a complex conveyance. This helped explain to first time buyers the stages which had to happen before they could purchase the property. They found that providing this helped reduce the number of complaints they received from first time buyers.

Reflecting on complaints handling

We found that following a complaint, some interviewees reflected on how their complaints handling could be improved. Suggestions included:

- Trying to speak with the client when a complaint is made. This then allows the client to verbalise and explain their concerns. Firms felt they were more likely to resolve a complaint if they understood the complaint and what remedy the client wanted from the outset;
- Diarising dates for when responses to complaints were due, in accordance with their timescales.
- Reducing response times. This was not always possible if resources were limited, but responding to a complaint promptly was beneficial to both firm and client. Not responding promptly to a complaint about delay often frustrated clients.

Survey respondents said that they used a range of resources relating to complaints, including SRA resources/guidance (70 per cent) and LeO resources/guidance (66 per cent). Some respondents stated that there needed to be further support given to solicitors handling complaints as it can be a stressful process.

Good practice

- Incorporating information about the nature, frequency and outcome of complaints to inform learning and development activities;
- Taking steps to understand the causes of complaints;
- Using data collected on complaints to bring about positive change in the way legal services are delivered; and
- If you lead a complaints team or are the complaints handling partner, providing feedback to individuals and their managers following a complaint, including as part of continuing competence and regular performance reviews. This should also include offering support and training to your staff in managing complaints.

Poor practice

- 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 any issues being repeated.

Further information and resources

Our resources

Online reviews: How to engage with them [https://beta.sra.org.uk/solicitors/resources/fees/engaging-online-reviews/]

First-tier complaints report 2023 [https://beta.sra.org.uk/sra/research-publications/first-tier-complaints-2023/]

Meeting the needs of vulnerable people [https://beta.sra.org.uk/solicitors/resources/specific-areas-of-practice/meeting-needs-vulnerable-people/]

Publishing complaints procedure [https://beta.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/]

Complying with Principle 6 - encouraging equality, diversity and inclusion [https://beta.sra.org.uk/solicitors/guidance/sra-approach-equality-diversity-inclusion/]

Support for solicitors: Your health, your career [https://beta.sra.org.uk/solicitors/resources/all-other-topics/your-health-your-career/]

The Legal Ombudsman's resources

Good complaints handling [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/good-complaints-handling/]

Complaint letter template [https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.legalombudsman.org.uk%2Fmedia%2F1lwbnrwt%2Fformal-

complaint-template-updated-23-april-18-1.docx&wdOrigin=BROWSELINK]

Guidance on Determining Complaints [https://www.legalombudsman.org.uk/media/ktaabwko/250121-our-approach-to-determining-complaints.pdf]

Guidance on Remedies [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/good-complaints-handling/guidance-on-remedies/]

The Legal Ombudsman have a Technical advice desk [https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/technical-advice-desk/] for legal service providers that can help give advice about complaints.

SRA Principles and Code of Conduct

These describe the standards we expect of individual solicitors and firms:

SRA Principles [https://beta.sra.org.uk/solicitors/standards-regulations/principles/]

Code of Conduct for Solicitors, RELs, RFLs and RSLs [https://beta.sra.org.uk/solicitors/standards-regulations/code-conduct-solicitors/]

Code of Conduct for Firms [https://beta.sra.org.uk/solicitors/standards-regulations/code-conduct-firms/]

SRA Transparency Rules [https://beta.sra.org.uk/solicitors/standards-regulations/transparency-rules/]

Law Society Resources

Meeting the needs of vulnerable clients [https://www.lawsociety.org.uk/topics/client-care/meeting-the-needs-of-vulnerable-clients]

Handling complaints [https://www.lawsociety.org.uk/topics/client-care/handling-complaints]

The Law Society Lawyerline [https://www.lawsociety.org.uk/contact-or-visit-us/helplines/] helpline provides guidance to solicitors on client care and handling complaints, including how to resolve complaints directly with clients and engage effectively with the Legal Ombudsman.

Other resources

Legal Choices [https://www.legalchoices.org.uk/]

Our approach

Overview

Approaches to complaints handling will vary across the profession depending on factors such as the organisation type, size, and practice areas. The purpose of this project was to gather a range of views and experiences from firms and solicitors. By sharing what people have told us, and giving our views, we hope to support others to reflect on their own practices and make improvements where they can.

We used visits and a survey to gather quantitative and qualitative information. The visits also provided an opportunity to review interviewees' complaints procedures and complaint files.

Visit sample

We identified an initial sample of firms who had dealt with complaints at firm level and had complaints escalated to LeO. We did this by looking at the data firms submit to us annually about complaints, as well as any information shared with us by LeO. We then selected our sample of 25 firms based on whether they met one or more of the following:

- higher than expected rate of premature complaints to LeO
- high percentage of their first-tier complaints referred to LeO
- low percentage of first-tier complaints referred to LeO.

The sample included firms of various sizes, based in both England and Wales. It also included a range of different practice areas. We visited these firms between January and March 2025.

What we did during a visit

Visits were split into two parts:

- We initially spoke with the person with overall responsibility for complaints.
- We reviewed two complaint files at each firm.

In total, we reviewed 50 complaint files. Where possible, we chose one complaint which had been resolved by the interviewees and one which had been escalated to LeO. We did this to better understand how matters were being handled.

Other documents reviewed

Where available, we reviewed any policies or procedures that were relevant to how firms and fee earners dealt with complaints. We also reviewed any learning and development resources relating to complaints.

Survey sent to 750 firms

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.

This required Compliance Officers to provide information on how their firm identifies and handles first-tier complaints. Survey responses were submitted between January and April 2025, though we did accept some late responses. The data used in our consultation was Page 27 of 28 Sensitivity: General correct at the time of publication. Due to the late responses to the survey, the percentages included in this report could vary by +/- 1 per cent.

Read more about what information firms were asked to provide [https://beta.sra.org.uk/sra/news/first-tier-complaints-survey/] .

Footnotes

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