

Changing our requirements on first-tier complaints

Consultation Response

October 2025

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Executive Summary

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

We have existing requirements in our Standards and Regulations framework for assuring standards in first-tier complaints handling and we know many of the individuals and firms we regulate are meeting these. However, we identified areas where we think we could strengthen our requirements and between 30 May and 1 August 2025 ran a consultation to gather views on proposals to do this. We asked for input into our guidance to help the firms and individuals we regulate to meet these proposed updated requirements. We also sought views on other areas we were considering around how both we and those that we regulate monitor and learn from complaints.

This was informed by evidence we gathered through a survey of 750 firms and a thematic review, as well as input from our stakeholders such as the Legal Ombudsman (LeO) and Legal Services Consumer Panel (LSCP). This identified improvements were needed in complaints handling across legal services. Our proposals were in line with and support the LSB's new [Statutory Requirements](#), [Statutory Guidance](#) and a [statement of policy](#) issued under section 112 of the Legal Services Act 2007 in May 2024, that will come into effect in November 2025.

Having analysed and carefully considered responses to this consultation and feedback from our stakeholder engagement, we are submitting our application to the Legal Services Board (LSB) for formal approval of regulatory changes to:

- make changes to when complaints information must be provided to a client;
- require complaints information to be clear, accessible and in a prominent place on firms' websites, where they have one (and made available on request when they don't have a website); and
- include the LSB's definition of a complaint in our glossary of defined terms.

We will also:

- produce new complaints handling guidance and case studies to help those we regulate to meet our requirements;
- start to collect more complaints data about timeliness of complaints resolution in 2026 from those we regulate to expand our understanding of first-tier complaints handling; and
- continue to work with LeO and other frontline regulators in developing LeO's model complaints resolution procedure and share the feedback we received from our consultation to help raise standards in complaints handling across legal services.

Background

We want consumers to be satisfied with the service they receive from those we regulate, and we know the majority are. The Legal Services Consumer Panel's (LSCP) [Tracker Survey](#) found that satisfaction with the service provided by legal service providers was at its highest in 2024, at 87 per cent.

However, the LSCP Tracker Survey has also found that a large number of consumers each year do not know how to complain. Many also stated in 2024 that they would be reluctant to raise their concerns with their provider at first-tier – citing reasons such as lack of trust or concerns it would take too long or thinking it would affect their bill. There is also [evidence](#) of additional barriers for people who may be vulnerable by their characteristics or circumstances when raising complaints. The Legal Ombudsman (LeO) also [reports](#) an increase in complaints raised at second-tier and is finding that the complaints handling at first-tier was poor in an increasing number of cases it investigates.

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

There are existing robust mechanisms for assuring standards in first-tier complaints for SRA regulated firms and individuals within our Standards and Regulations framework. These include that the individuals and firms 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. They must also deal with complaints promptly, fairly and free of charge, and signpost to LeO for complaints about poor service and to us for any concerns about conduct.

However, after reviewing our evidence alongside that of our stakeholders such as [LeO](#) and [LSCP](#), we found areas where we think we should enhance the regulatory framework we have in place and the guidance we provide for those we regulate. Our evidence includes findings from our survey of 750 firms and thematic review, where we identified variation in how firms identify, define and handle complaints, how they support vulnerable clients, and other areas where firms asked for more guidance and support.

This is with a view to driving improvements in complaints handling by those we regulate and outcomes for consumers.

We therefore [consulted](#) on changing our requirements and producing new guidance on complaints. We sought views on our 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 guidance to help those we regulate to understand our enhanced requirements and how to meet our Standards and Regulations. This includes combining this with our existing guidance on publishing complaints procedures.

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

- Collecting and publishing additional complaints data; and
- Co-development of a model complaints resolution procedure.

Our proposals were in line with and support the LSB's new [Statutory Requirements](#), [Statutory Guidance](#) and a [statement of policy](#) issued under section 112 of the Legal Services Act 2007 in May 2024, that will come into effect in November 2025.

Who we heard from

The consultation ran from 30 May 2025 until 1 August 2025.

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 Legal Services Consumer Panel (LSCP). We also heard views through a stakeholder engagement programme 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.

We promoted the consultation through a range of communication channels, including social media and our website.

We are grateful to everyone who took the time to respond to our consultation. We have reviewed and considered each response in developing our final policy positions.

Our final positions

In this section, we outline:

- each consultation question;
- a summary of the responses we received to the consultation;
- feedback received from our stakeholder engagement where relevant;
- our final policy positions; and
- our next steps.

For some questions we have combined our summary of responses and final position.

Consultation questions 1a-d:

Q1a. Do you agree with our proposal to expand 8.3 of our Code of Conduct for Solicitors, RELs, RFLs and RSLs, which will also apply to firms under section 7.1 (c) of our Code of Conduct for Firms, to include that complaints information must be provided to clients on conclusion of the legal matter?

Summary of responses

Most respondents were opposed to the proposal that complaints information must be provided to clients on conclusion of the matter, including the Law Society and the majority of local Law Societies, law firms and individual solicitors.

Concerns raised were that there is a risk of encouraging unjustified complaints, information overload for clients, and undermining client confidence and business relationships by ending a matter on a negative note. Some respondents felt this was inappropriate, overreaching regulation and that the proposal was disproportionate. Some stated that it could lead to an increase in complaints.

There were also practical implementation challenges raised around it not always being clear when a legal matter ends – particularly in long-running or complex cases.

The LSCP expressed support for the proposal. It shared evidence from its [Tracker Survey](#) that 51 percent of consumers do not know how to make a complaint and expressed that this ‘must be addressed with mandatory requirements’.

LeO and the Association of Consumer Support Organisations (ACSO) were broadly supportive of our aims but made some suggestions. ACSO recommended that solicitors and firms should be allowed time to adjust and comply with our requirements.

Some supportive respondents stated that providing complaints information again at the conclusion of a matter may help clients who may not have fully understood or remembered the information provided at the outset, particularly vulnerable people. The consumers we engaged with agreed with this, with some saying they did not recall receiving the complaints information when they instructed a solicitor.

This was echoed during our stakeholder engagement at our roundtable with consumer organisations, who all supported our proposals. One attendee said the vulnerable people they work with often struggle with information retention. Attendees also stated that the people they support may be more empowered to complain at the end of a legal matter when they may have less concerns about a complaint impacting on their case.

Q1b. Do you agree with our proposal to expand 8.3 of our Code of Conduct for Solicitors, RELs, RFLs and RSLs, which will also apply to firms under section 7.1 (c) of our Code of Conduct for Firms, to include that complaints information must be provided to clients upon request?

Q1c. Do you agree with our proposal to expand 8.3 of our Code of Conduct for Solicitors, RELs, RFLs and RSLs, which will also apply to firms under section 7.1 (c) of our Code of Conduct for Firms, to include that complaints information must be provided to clients if a complaint is made during a matter?

Summary of responses

Most respondents agreed with these proposals. Some stated that they already provide the information when someone requests it and when someone complains. For these reasons, some respondents raised doubts as to whether a rule change was needed.

A few respondents disagreed with these proposals, stating that they were unnecessary and burdensome.

Q1d. Please add any comments that you have on when complaints information must be provided to clients.

Summary of responses

A number of respondents took the opportunity to reiterate comments about the perceived drawbacks of our proposals in this area, particularly in respect of providing complaints information at the conclusion of a legal matter.

Our position

We will proceed with our proposals to require that complaints information be provided to clients on conclusion of their matter, on request and if a complaint is made during the matter.

While we acknowledge the strength of concerns from the profession on these proposals, particularly about providing the complaints information at the conclusion of the matter, we believe there is clear evidence that this is necessary to improve consumer knowledge and confidence in complaining in legal services. This includes findings from the LSCP [Tracker Survey](#) that over 51 per cent of consumers say they would not know how to make a complaint and nearly a third would not raise issues directly with providers, citing barriers like fear, mistrust or concern over delays and costs. In particular, the evidence shared with us from consumers and consumer organisations supports that requiring complaints information be provided more regularly could help overcome barriers to complaining for people who are vulnerable by their characteristics or circumstances.

The consumers we engaged with were supportive of this proposal and disagreed that it would end a legal matter negatively. They stated that they were familiar with being asked for and giving feedback after they have received a service. This includes offering positive feedback such as through an online review, if they were satisfied. A firm we interviewed for our thematic review told us that proactively requesting client feedback helped them to identify and resolve issues and improve customer service.

We acknowledge that while our proposals could lead to an increase in complaints being raised, this is preferable to the current risk that clients with genuine reasons to complain do not do so because they cannot recall the information provided at the outset, or they do not have the confidence to do so until the end of the legal matter.

We considered suggestions from respondents that these changes did not require rule changes or could sit in SRA guidance. There is evidence that some firms are not meeting our existing requirements in this area, such as LeO's data that it saw poor complaints

handling in 46 per cent of the cases it investigated in 2023/24, for reasons including not providing the complaints information or signposting to LeO or providing incorrect information. We believe strengthening our rules in this area will provide more clarity and consistency. Solicitors and firms will be clearer about our expectations and our approach to compliance and enforcement by approaching in this way.

We have also covered this issue in the guidance we have developed to help support those we regulate to meet our requirements in this area.

Consultation questions 2a-e:

Q2a. Do you agree with our proposal to expand Rule 2 of our Transparency Rules to state that complaints information published under this rule must be clear and accessible and in a prominent place on a firms' website?

Q2b. Please explain the reasons for your answer.

Q2c. What are your views on us mirroring the wording we have in our guidance on transparency in price and service about prominence?

Q2d. What are your views on us including more information in our guidance on prominence – such as including reference to it not requiring multiple clicks to access or that it should be linked from a homepage?

Q2e. What are your views on us including more information in our guidance on how firms or freelance solicitors that do not have a website should provide complaints information? Please give reasons for your answer and tell us what would be helpful to include.

Summary of responses

Most respondents supported the proposals in principle, especially the need for information to be clear and accessible.

However, many were concerned about the requirement that information be in a 'prominent place', citing reasons including a lack of clarity on what prominence means and technical considerations regarding the layout and structures of websites.

Some respondents were opposed to the proposal, raising concerns about the resources involved in updating their websites, although no respondents gave an estimation of likely costs or resources for this.

Many respondents stated that they welcomed clearer guidance, to aid compliance and consistency. Many supported us mirroring the wording we have in our guidance on price and service about prominence which they also said would promote consistency and help solicitors and firms comply more easily. Many were also supportive of us including more information in our guidance on prominence and on how firms or freelance solicitors who do not have a website should provide complaints information. They asked for worked examples or case studies to support this.

Some respondents were opposed to us producing guidance overall, considering it to be inappropriate or unnecessary.

Consumers we spoke to during our stakeholder engagement were supportive of these proposals. During a task where we showed them a range of solicitors' websites and complaints procedures, they noted the variation in how the information was presented and positioned. They located the complaints procedures more easily when a link was on the homepage. When asked about these proposals, attendees at our roundtable of consumer organisations were also supportive. They suggested we be specific about where the complaints procedures were positioned on a website. They also urged us to consider the importance of digital inclusion and, as well as prominence, the use of supportive technology such as screen-readers should be considered as well as the colours and fonts used on the website.

Our position

We will proceed with the proposal to update our Transparency Rules to include that complaints information is clear, accessible and in a prominent place on a firms' website, where they have one. This will mirror the requirement for cost information.

In response to the feedback raised about 'prominence', we will include the wording from our price and service guidance but expand with examples of what this could look like. We will include examples of how this information could be provided when firms or freelance solicitors do not have a website. This will also help solicitors and firms in providing information to those who do not have access to the internet or who are not digitally confident.

We will also include in the guidance a section on accessibility and supporting vulnerable people, which will cover the importance of website accessibility.

Consultation question 3:

Q3. What are your views on us including the LSB's definition of a complaint as a defined term in our Standards and Regulations Glossary?

This is:

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

Summary of responses

Some respondents were supportive of our proposal to include the LSB's definition of a complaint in our Standards and Regulations Glossary, mainly for reasons of consistency. However, many respondents who agreed in principle expressed concerns about the breadth of the LSB definition. The most widely expressed concerns were that minor, easily resolved difficulties could fall within the LSB definition and that there should be a distinction between complaints about the firm's service, and client dissatisfaction with matters outside the firm's control.

LeO supported the proposal and said that it already uses the definition. The LSCP stated that the proposal 'promotes regulatory coherence and provides clarity for consumers and providers alike'. The LSCP stressed the importance of monitoring the effectiveness of the definition in improving reporting and resolution of consumer issues.

Some respondents were opposed to the proposal, seeing the LSB definition as too broad or vague.

In our roundtable with consumer groups, they were supportive of the definition, stating that this would help consumers, and in particular vulnerable consumers, to understand what they could complain about.

Our position

We will proceed to add the LSB's definition of a complaint as a defined term in our Standards and Regulations glossary.

We want solicitors and firms to feel able to resolve complaints informally and at the earliest opportunity. We understand from our thematic review that firms define complaints in a variety of ways. We believe that signposting to the LSB's existing definition will provide greater clarity and consistency in what we expect solicitors and firms to identify and report as complaints.

Using the same definition as LeO and many of the other frontline legal regulators will bring consistency to both first and second-tier complaints across the sector. We believe these benefits of consistency outweigh the concerns raised by respondents but will monitor and evaluate the introduction and use of the definition.

Consultation questions 4a-c:

Q4a. What are your views on us producing new guidance to help those we regulate meet our requirements on complaints handling? Please give reasons for your answer.

Q4b. What are your views on us combining our new guidance with our existing guidance on publishing complaints procedures? Please give reasons for your answer.

Q4c. Do you have any suggestions for areas we should include in guidance we develop to help solicitors and firms understand our requirements and how to meet our Standards and Regulations in relation to complaints? If so, please give details.

Summary of responses

Many respondents supported our proposal to develop new guidance on complaints handling and for us to combine it with our existing guidance on publishing complaints procedures. They said they would welcome clear, consolidated, practical guidance.

A small number of respondents saw additional guidance as unnecessary, potentially bureaucratic or as more appropriately provided by LeO.

Respondents had a number of suggestions for areas the guidance could cover in addition to the areas suggested in the consultation, which we are exploring. These included: accessibility and supporting vulnerable clients, examples of prominence, handling vexatious and challenging complaints, complaints from third parties and guidance on remedies.

The consumer organisations that we engaged with suggested guidance for solicitors and firms on accessibility and supporting vulnerable clients. Many shared resources they have developed for us to use or signpost to.

Our position

We will proceed to produce new guidance on complaints handling. This will cover a number of the areas in the LSB's requirements, guidance and statement of policy as well as areas identified in our thematic review that we included in our consultations, as well as additional areas suggested by consultation respondents.

We will work with LeO on developing the guidance to ensure it does not duplicate any of LeO's resources and signposts to existing resources such as practice notes produced by The Law Society.

Consultation questions 5a-c:

Q5a. What are your views on the SRA collecting and publishing timeliness data at firm level?

Q5b. What contextual information would be required to make the information useful to consumers and be fair to solicitors and firms?

Q5c. What information about complaints would be most helpful to consumers and why?

Summary of responses

In addition to our proposals to strengthen our rules on first-tier complaints, we asked for views on collecting and publishing timeliness data about complaints at firm level.

The majority of consultation responses from the profession expressed concerns, including:

- the risk of misleading impressions if the data was not contextualised adequately, and the difficulty of such contextualisation;
- a disproportionate burden on firms in gathering the data for the SRA
- an increased compliance burden on firms, increasing costs that would be passed onto consumers;
- doubts over the value of the information to consumers; and
- unintended consequences, for example firms rushing responses to meet timeliness targets rather than focusing on quality of their responses.

A few firms and individual solicitors supported the idea of the SRA collecting timeliness data internally, and publishing anonymously or as limited statistics, but not publishing at firm level.

The LSCP in its response to the consultation stated that the existing data we collect and publish on complaints could be improved in its scope and accessibility and made suggestions for how we could do this. It also supported the collection and publication of timeliness data to raise standards and help identify risks.

Many respondents made suggestions for more general information for consumers be made available about complaints that would raise awareness of their right to complain and the processes for first and second-tier.

Consumers and consumer organisations we engaged with were generally supportive of there being some public complaints data in an accessible format, if it was reliable and 'trustworthy'. One recalled not trusting 'unverified' reviews on websites. Some said it could help inform consumer choice, and some shared examples of other sectors where they had seen complaints data published. One consumer raised concerns about whether it was fair to solicitors, citing concerns such as complaints being unjustified or firms being targeted unfairly.

Our position

We will start to collect timeliness 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. 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 and give those we regulate notice and further detail, including what data to start collecting and when, in early 2026.

We will also explore what more we can do with the data we already collect and publish at aggregate level in our first-tier complaints annual report.

We will consider what consumer information we could publish on our website and on [Legal Choices](#) in conjunction with the other frontline legal regulators, to inform consumers and raise awareness of their right to complain and the processes for doing so.

Consultation question 6:

Q6. Do you agree that introducing a model complaints resolution procedure for the sector would be helpful?

Please give reasons for your answer, including anything you think should be taken account of in the development of a model complaints resolution procedure?

Summary of responses

In our consultation, we shared information about a model complaints resolution procedure that LeO has been developing, working with us and the other frontline legal regulators. This is a template first-tier complaints procedure that can be used by any legal service provider in England and Wales.

We asked for views on whether introducing a model complaints resolution procedure for the legal sector would be helpful, and for suggestions of what should be taken into account in developing this.

Responses to the idea of a model complaints resolution procedure were mixed. Some solicitors, law firms and their representative groups raised concerns around practicality, flexibility, proportionality and regulatory overreach.

Some stated that a model complaints resolution procedure could help smaller firms but should not be mandatory or overly prescriptive. Many respondents, including The Law Society, stated that they would welcome a model complaints resolution procedure as a non-mandatory template or resource that could be flexible and adaptable.

Some responses stated there were potential advantages of greater uniformity, including clarity and consistency.

The LSCP strongly supported the introduction of a model complaints resolution procedure, citing potential benefits of it setting expectations, reducing variation and improving consumer outcomes. It stated that consumer engagement in it is critical in shaping the format, language and delivery method, and appropriate testing. This was to ensure it is both adopted and effective.

Through our stakeholder engagement, consumers we spoke to were supportive and shared examples from other sectors where there were set procedures or timeframes. Consumer organisations we engaged with were also supportive, stating that standardisation helps consumers know what to expect. One consumer organisation representative expressed the need for flexibility and adaptability with such resources.

Our position

We will share the detailed responses and feedback we received with LeO for it to continue to progress work in this area, which we will support. This is because we agree a model complaints resolution procedure could be a beneficial resource for bringing greater

consistency and help consumers know what to expect. We agree with the LSCP 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](#). This also sets out its plans for a full consultation on the draft model complaints handling procedure to take place in 2026.

Consultation question 7:

Q7. Do you have any comments on the regulatory impact of our proposals on first-tier complaints?

We asked in our consultation for comments on the regulatory impact of our proposals on first-tier complaints. We have included our Regulatory Impact Assessment at Annex 4.

Consultation question 8:

Q8. Do you have any further comments you would like to share with us when reviewing our requirements and producing guidance on first-tier complaints?

Summary of responses

There were a number of comments and suggestions for the guidance, with some respondents repeating their concerns about prescription and proportionality – including introducing a model complaints resolution procedure.

We received a number of other comments about our regulatory approach, some stating that no intervention was needed, referencing the existing role and remit of LeO.

Some respondents, in response to this and other questions, stated that the SRA was referencing a thematic review without publishing the supporting data.

Our position

We acknowledge the concerns raised and strength of feeling in responses to our consultation overall, noting the large majority of responses were from solicitors, law firms and law societies. We have responded to the concerns raised in detail in response to individual questions.

We have now published the [full report of our thematic review and survey](#). We were able to analyse and use the data and key findings from this exercise in our policy development and include as key evidence in the consultation where it informed our proposals.

We have taken into consideration suggestions for giving solicitors and firms time to make the required changes. We therefore propose an implementation time of three months from the date the LSB makes a decision on our application for changes to our regulatory arrangements. This will allow solicitors and firms time to make changes, such as to systems they use for template closing letters.

Consultation question 9:

Q9. Do you have any comments on our draft equalities impact assessment?

The aim of our proposals is to improve complaints handling in a way that is inclusive, accessible and proportionate, recognising the diverse needs of consumers and legal professionals. We have considered the potential impacts on individuals with protected characteristics under the Equality Act 2010, including those raised in response to the consultation and updated our EIA in more detail at Annex 5.

Next steps

Having analysed responses to this consultation, we plan to proceed with the regulatory changes needed to strengthen our requirements on first-tier complaints.

We will submit our application to the LSB for formal approval of the regulatory changes. We will ask the LSB to approve the changes to take effect ahead of its implementation deadline of 16 November 2025 for its [Section 112 Requirements for Approved Regulators' Regulatory Arrangements](#). We will then give those we regulate three months to implement the changes.

We will produce new complaints handling guidance and case studies and publish this on our website to help solicitors comply. We will also publish further information on our next steps for collecting more data on complaints in early 2026.

Additionally, we will monitor the implementation of the change to identify any unintended consequences or changes as part of an evaluation exercise.