Blind Justice

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POSITION PAPER

# NOT FIT FOR PURPOSE

## WHY PARLIAMENT MUST REBUILD THE REGULATION OF SOLICITORS

*The Solicitors Regulation Authority has now admitted, in a formal legal response, three failings in its handling of one misconduct report. Those admissions reflect patterns of inadequate enquiry and reasoning documented in Blind Justice's research since January 2026. A regulator that corrects itself only under the threat of judicial review cannot be reformed from within. This paper sets out what must replace it.*

**Blind Justice UK**

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### WHAT THIS PAPER SAYS

On the 8th of April 2026 Blind Justice wrote to the chief executive of the Solicitors Regulation Authority, naming a case and setting out that a decision not to investigate had presented unverified assertions as settled facts. The letter was passed back to the officer whose decision was being challenged. Five months later the same officer decided, again, not to investigate. Only after Blind Justice sent a letter before claim for judicial review did the SRA admit, on the 22nd of October 2026, that it had assessed the report too narrowly, made enquiries that were not detailed enough and given insufficient reasons, and agree to withdraw both decisions.

That admission concerns one case. The evidence in this paper shows the method behind it is not confined to one case. In 2024/25, its latest reported year, the SRA closed 10,382 reports at assessment with no further action, 72 per cent of the 14,420 matters it dealt with. It has published no independent audit of those closures, and the person who made the report has no right under the SRA's rules to require a review. In a second case in this paper, a practising solicitor reported a firm with the documents in hand. The SRA accepted the firm's account without checking it against the trial bundle. When the firm later acknowledged its statement was incorrect, the SRA accepted the statement had been material to its assessment and still decided not to investigate. Blind Justice's published research documents the same method across the regulator's work: accounts from the regulated side accepted with no check recorded, reasons that do not show what was verified, and a public record that forgets. The same method let it miss warnings it already held about failing firms, and it applies its rules unevenly to the profession it regulates. Its oversight body concluded in September 2026 that there is not sufficient evidence its changes are working.

This is not only about solicitors. Every business asks its lawyers what it can and cannot do, and good legal regulation underpins the way every sector treats the people it deals with. The system cannot repair itself. Blind Justice calls for three things: open the closed files, give the public the right to challenge the regulator, and rebuild the regulator by Act of Parliament. The eighteen recommendations in section 11 set out how.

## Findings at a glance

| | |
|---|---|
| 10,382 | Reports the SRA closed at assessment with no further action in 2024/25: 72 per cent of the 14,420 matters it dealt with. 2,673 were referred for investigation, fewer than one in five. |
| 0 of 11 | The SRA's own published worked examples that end in no action and record any independent check of what the regulated person said. |
| 43 of 67 | Tribunal cases of false or misleading information given to the SRA in which the falsehood was exposed by an SRA officer checking documents. Checking works. In the assessment decisions Blind Justice holds, no check is recorded. |
| 564 | Complaints in one year about decisions not to investigate, 86.7 per cent of complaints about the SRA's investigation work. The person who reported has no right to apply for a review. |
| £100m | Client money lost in two collapses, on the Legal Services Board's estimate. Independent reviews found the SRA held warnings about both and accepted the firms' explanations. |
| 0 of 56 | Review-site profiles of firms the SRA had fined, rebuked or closed since 2023 that show the SRA's decision. Fifty-five display the SRA's badge. |

## A statement from WhistleblowersUK

*'Time and again the public becomes the victim not only of the criminal and unethical conduct of regulated individuals, which is a scandal in its own right. What this report exposes is the bigger scandal hiding in plain sight: the failure of the regulator to regulate. WhistleblowersUK is alarmed by the conduct of the SRA and its dismissal of serious concerns, including reports of the loss of client money. This report shines a light on the facts, and calls on the SRA to work with the author and WhistleblowersUK to take a fresh look at these complaints and prevent further miscarriages of justice. It is time for all regulators to end the practice of marking their own homework, and to back calls for an Office of the Whistleblower.'*

**Georgina Halford-Hall, CEO, WhistleblowersUK**

# 1. The admission

In January 2026 Blind Justice's founder reported concerns about a solicitor to the SRA, supported by publicly available material. On the 10th of March an investigation officer decided not to investigate. The decision letter presented assertions about the solicitor's history as settled facts without indicating that any of them had been checked. Blind Justice asked the SRA six questions about what verification had been done. The SRA refused all six.

On the 8th of April 2026 Blind Justice wrote to the SRA's chief executive, naming the case and setting out that the decision presented unverified assertions as settled facts. The reply came from the officer who had made the decision. On the 15th of September the same officer decided, a second time, not to investigate, after seeking an explanation from the solicitor. The SRA later confirmed it had not carried out formal checks of the qualification it had been asked to verify.

On the 30th of September Blind Justice sent the SRA a letter before claim for judicial review. On the 22nd of October the SRA replied through its solicitors. It accepted three failings, in these words:

> *'It treated the Report as being narrower in scope than it actually was. The Defendant's considerations at the ATT stage were therefore too narrow. … those enquiries were not detailed enough. … insufficient reasons were given for the 2nd Decision.'*
>
> The SRA's formal response, 22nd of October 2026

The same response confirmed that the SRA's rules do not give the person who reports a solicitor any right to apply for a review of a decision not to investigate. 'The ANRARs do not permit an application by you for a review of such a decision.' The SRA can review a decision 'of its own initiative'. It agreed to withdraw both decisions and to reconsider the whole report through 'a decision maker not previously involved', with reasons 'that address each element of the Report'. It disclosed that it had asked the solicitor about the qualification in question 'but did not carry out formal checks', and that quality control 'takes place via a process whereby dip samples are reviewed each month'.

Three things follow. The failings were real, and the regulator has said so. They were reported to the top of the organisation six months before they were admitted, and the complaint was handed back to the person complained about. And they were corrected only when the regulator faced a threatened claim in the High Court. A member of the public without the knowledge, the confidence or the money to threaten judicial review would still be holding two decisions the SRA has now agreed to withdraw, after admitting they were reached too narrowly, on enquiries that were not detailed enough and with insufficient reasons.

No court has found the decisions unlawful, no proceedings have been issued and no finding of misconduct has been made against the solicitor concerned, who is not named. The point is not the solicitor. The point is what it took to make the regulator look properly. The admission concerns this case alone. Sections 2 to 7 set out why it cannot be treated as an isolated one.

# 2. A regulator that takes their word for it

The SRA's front door is its Assessment and Early Resolution Team. In 2024/25, the latest year it has reported, it received 15,914 reports, the highest number in seven years. It dealt with 14,420, closed 10,382 of them with no further action, 72.0 per cent, and referred 2,673 for investigation, 18.5 per cent. The number referred rose by half on the year before, when 1,763 of 11,421 matters (15.4 per cent) were referred. That rise is welcome, and this paper does not say the SRA investigates too few reports. It asks how the other 10,382 were decided, and who checked. In 2018/19, the year the team was introduced, the share referred was 37.3 per cent, though the SRA's figures change basis across those years and the comparison is indicative. For most people who report, the assessment is the whole of the regulator's response.

**Table 1. The front door in figures**

| Figure | What it shows | Source |
|---|---|---|
| 15,914 | Reports received by the SRA in 2024/25, the highest in seven years (11,852 in 2023/24). | SRA, Investigations and enforcement annual report 2024/25, Oct 2026 |
| 10,382 | Closed at assessment with no further action in 2024/25: 72.0 per cent of the 14,420 matters dealt with (8,317, 72.8 per cent, in 2023/24). | SRA annual report 2024/25 |
| 2,673 | Referred for investigation in 2024/25, 18.5 per cent of matters dealt with, up from 1,763 (15.4 per cent) in 2023/24. | SRA annual report 2024/25 |
| About 510 | Reports in 2023/24 that ended in a finding, roughly 4.3 per cent of those received. About 1,253 of the 1,763 referred that year (71 per cent) did not. Approximations. | The Complaints Black Hole, May 2026 |
| 37.3% to 18.5% | Share of concerns referred for investigation, 2018/19 to 2024/25, with a low of 15.4 per cent in 2023/24. Indicative: the SRA's basis changes across the period. | SRA annual data; Taking Their Word For It: The Evidence |
| 134 to 78 | Referrals to the Solicitors Disciplinary Tribunal, 2017/18 to 2023/24, while lower-level actions rose from 405 to 1,069. | The Complaints Black Hole |
| £14.5m to £23.4m | Annual cost of investigation, 2017/18 to 2023/24, in cash terms, not adjusted for inflation. | The Complaints Black Hole |
| 1,024 to 2,197 | Reports a month: the 2023/24 average, then the record of October 2025. | Taking Their Word For It: The Evidence |
| 60 to 42 days | Average assessment time, October 2025 to February 2026, as closures rose by 32 per cent. | Taking Their Word For It: The Evidence |
| 38 to 54% | Cases resolved within two months between July and October 2025, against a target of 80 per cent. | Taking Their Word For It: The Evidence |
| 3 firms | Panel law firms to which assessment is partly outsourced, reported to provide around fifty staff. | Taking Their Word For It: The Evidence; Legal Futures, May 2026 |
| 56% | Share of matters dealt with in 2023/24 that were reported by members of the public. | A Law Unto Themselves? |

Figures are the SRA's own, as published in its annual data, Board papers and correspondence, and analysed in the reports named.

Taking Their Word For It (September 2026) read the SRA's own published worked examples, the examples it uses to show the public how it decides. Eleven end in no further action or an outcome in which the SRA says it is unlikely to investigate. None of the eleven records any independent corroboration. Three rest on the regulated person's account alone. Of the fourteen that end in investigation or other action, eleven record an independent source. The regulator checks when it has already decided to act. When it decides not to, it records no check at all.

The decision letters show the same thing. Across fourteen concerns in five recent assessment decisions, written by three officers on three matters, the number of times an officer recorded checking the solicitor's account against anything outside it was nil. Seven concerns closed on that account alone. One closing line

reads: ‘Given the explanation provided by [the solicitor], we are satisfied that no further investigation is required on this occasion.’ Asked what had been verified, the SRA’s complaints manager wrote: ‘Aside from the information provided by our [internal] team, we did not seek further evidence.’

No Further Questions (September 2026) widened the lens to nine decisions covering twenty-six concerns between March 2022 and September 2026. Twelve ended on an account from the regulated side. One ended on an innocent explanation the regulator supplied on the solicitor’s behalf: ‘In the alternative, the Court may have granted him a right of audience.’ Two of the nine decisions recorded an independent check, and in only one did the check decide a concern. A file the firm said it had destroyed was accepted as destroyed with no approach to the firm. A firm’s statement that no inaccurate court order had been submitted was accepted with no record of the court file being obtained.

The regulator knows that checking works. Of 67 Solicitors Disciplinary Tribunal cases since 2015 in which a solicitor gave the SRA false or misleading information, the falsehood was exposed by an SRA officer checking documents in 43. Most of those, 32, were in forensic investigations. Eleven of the 67 false statements were made at assessment or early enquiry, and eight of those came to light from outside the SRA. At the stage where most reports end, the regulator does not find the lie. Someone else has to.

The House of Lords heard the same failure described on the 1st of September 2026, in the Second Reading debate on the Public Office (Accountability) Bill. Baroness Featherstone said: ‘It is not enough to provide a whistleblowing procedure if those receiving the warning can satisfy their responsibility by processing the complaint rather than confronting what it says.’ At the assessment stage, the SRA processes the report. It does not confront what the report says.

### WHAT THE INDEPENDENT REVIEWS FOUND

Three independent reviews into three of the major law firm collapses of recent years reached the same finding in different words. One records that the SRA ‘placed its trust in law firms’ and accepted a firm’s explanation, allowing it to keep trading. One found the regulator ‘placed the onus on complainants to provide it with evidence’ and accepted a firm’s account ‘at face value, despite the contradictory evidence’. The third found ‘the SRA taking the [firm’s] explanations at face value and opting not to investigate further’.

On the 5th of March 2026 the Legal Services Board publicly censured the SRA. Announcing the censure, it listed among the failures ‘over-reliance on information provided by [the firm] itself, rather than independent verification’. On the 3rd of September 2026 it put the client money lost in two of the collapses at approximately £100 million.

**Table 2. What the decisions record**

| Figure | What it shows | Source |
|---|---|---|
| 0 of 11 | SRA worked examples ending in no action that record any independent corroboration. Of 14 ending in action, 11 record an independent source. | Taking Their Word For It, Sept 2026 |
| Nil | Times an officer recorded checking the solicitor’s account against anything outside it, across 14 concerns in five decisions. | Taking Their Word For It |
| 7 of 14 | Concerns in those decisions closed on the regulated person’s account alone. | Taking Their Word For It: The Evidence |
| 3 of 5 | Decisions that returned the burden of proof to the person who reported. | Taking Their Word For It: The Evidence |
| 12 of 26 | Concerns in nine decisions, 2022 to 2026, that ended on an account from the regulated side. One more ended on an explanation the SRA supplied itself. Two of the nine decisions recorded an independent check. | No Further Questions, Sept 2026 |
| 43 of 67 | Tribunal cases of false information given to the SRA exposed by an SRA officer checking documents. | Taking Their Word For It |

| Figure | What it shows | Source |
|---|---|---|
| 8 of 11 | False statements made at assessment or early enquiry that came to light from outside the SRA. | Taking Their Word For It: The Evidence |
| 564 | Complaints in one year about decisions not to investigate: 86.7 per cent of complaints about the SRA's investigation work. | Taking Their Word For It |
| 28 of 69 | Formal reviews requested in 2024/25 by solicitors and firms subject to an SRA sanction or control that succeeded; four more succeeded in part. People whose reports were closed have no equivalent right. | SRA annual report 2024/25 |
| 76 of 94 | Independent Reviewer reports that concerned a regulatory decision, which the Reviewer cannot overturn. | Taking Their Word For It: The Evidence |
| No successful case found | Judicial review by a member of the public of an SRA decision not to investigate. Two attempts by one litigant were certified totally without merit. Searches not exhaustive. | A Law Unto Themselves?; Taking Their Word For It: The Evidence |
| Any | Member of investigations staff may sign off a closure under the SRA's schedule of delegation. | A Law Unto Themselves? |

The decision letters are a set gathered by Blind Justice, not a sample, and are not a measure of how often anything happens across all SRA decisions. Their shape is the finding.

The reviews were about firms that collapsed. The worked examples, the decision letters and the admission of the 22nd of October are about ordinary reports from ordinary people. The method is the same. The quality measure the SRA has adopted for assessment is whether two officers agree, at 90 per cent or more of sampled cases. Agreement between two officers who both took the account on trust is not a check.

None of this is a finding against any solicitor. The accounts the SRA accepted may have been true. The finding is about the method: a regulator that does not record checking what it is told cannot know whether it was told the truth.

## 3. No way back

Every one of the decisions Blind Justice has examined carries a version of the same closing line: 'Under the SRA Application, Notice, Review and Appeal Rules, there is no right of appeal or review of this decision by either the person who reported the concerns to us, or the subject of this decision.'

That sentence is accurate, and that is the point. A decision not to investigate is not on the list of reviewable decisions, so neither side can apply. The rules provide formal review rights for specified decisions affecting solicitors and firms, including sanctions and controls. A solicitor or firm can apply for a formal review on the grounds that the decision was materially flawed or that new information would have had a material influence on it, decided by someone other than the original decision maker. The rules provide no equivalent right for a person whose misconduct report has been closed without investigation. A Law Unto Themselves? (September 2026) found that the only public-facing entry in the list of reviewable decisions is a refusal of a Compensation Fund claim.

What the reporter has instead is a discretion. The SRA's complaints policy, as updated in July 2025, said that if the reporter believes a decision not to investigate is materially flawed, 'If we agree this is the case, then we can review the decision. Reviews, however, sit outside the Complaints Policy, so please contact the team you have been dealing with.' The team the reporter is dealing with is the team that made the decision. The SRA's current wording, quoted in its response of the 22nd of October, is: 'The team will tell you if the decision can be reviewed. Reviews are not part of our complaints policy.'

That is what happened in the case the SRA has now reopened. When Blind Justice wrote to the SRA's chief executive in April 2026 about the first decision, the reply came from the investigation officer who had made it: '[The chief executive] has passed it on to me in the Investigations directorate.' The same officer then made the second decision. The SRA has now agreed to withdraw both.

Nobody else can put it right. A stage two complaint outcome from the SRA in September 2026 said: 'I have not undertaken new enquiries, and I cannot act to change or provide an alternative outcome for you.' The Independent Reviewer of Complaints 'cannot review or overturn any regulatory decisions'. In its report for the year to October 2024, 76 of the 94 reports it issued concerned a regulatory decision. The Legal Services Board 'does not have jurisdiction to review approved regulators' decisions or process on individual cases.' Blind Justice's searches, which were not exhaustive, found no successful judicial review by a member of the public of an SRA decision not to investigate. The only attempts found, two by one litigant, were certified totally without merit.

The demand is there. In one year the SRA received 564 complaints about its decisions not to investigate, 86.7 per cent of all complaints about its investigation work. The SRA's own review figures show who gets a second look. In 2024/25 solicitors and firms subject to a sanction or control it had imposed asked for 69 formal reviews. Twenty-eight succeeded and four more succeeded in part: almost half changed the outcome. The SRA publishes no equivalent figure for people whose reports were closed, because its rules give them no right to apply.

Parliament has identified the same gap in another regime. Of the whistleblowing law, Baroness Kramer told the House of Lords on the 2nd of December 2022 that it 'provides no mechanism to make sure that a whistleblowing report is investigated or that the whistleblower ever knows what happens.' The SRA's rules leave the person who reports a solicitor in the same position: no assurance that the report will be investigated, and no right to a second look when it is not.

The system gives stronger safeguards against wrongful regulatory action than against wrongful inaction. A solicitor who is sanctioned can apply for a formal review. The member of the public who is turned away cannot.

# 4. What the public is shown

A person choosing a solicitor, or deciding whether to report one, relies on what the regulator lets them see. Blind Justice has examined that record in seven reports. It is incomplete, it is temporary and it is not where people look.

**Redress.** The Legal Ombudsman found poor service in 71.9 per cent of the complaints it assessed in 2025/26 (The Invisible Ombudsman), and poor complaint handling by the firm itself in 46 per cent of those it investigated in the first three quarters of that year (The Complaints Ledger). In four years it dismissed or discontinued 8,680 complaints under one rule, 50.9 per cent of the 17,043 closures listed in the table it disclosed. It does not record how many complainants withdrew after an investigator told them their complaint should be dismissed (The Memory of Justice II, August 2026).

**Complaints.** Firms reported around 289,000 first tier complaints to the SRA between 2013 and 2023 (no figures exist for 2020). Nothing the SRA publishes attributes any of them to a named firm. In 2018 the SRA decided not to publish the data, saying it does not verify it, and to signpost consumers instead to the Legal Ombudsman. The Ombudsman removes each of its decisions twelve months after publication. The Complaints Ledger (August 2026) found that 141 of 151 firms audited carried the register line 'There are no disciplinary or regulatory decisions currently published about this firm', and that the signposted search returned nothing for 73 of 131 firms in its purposive sample. The Invisible Ombudsman (July 2026) counted 11,448 decision entries in five expired official files that are no longer on the public record.

**Decisions.** 'Most published decisions are removed from our website three years from the date they were published.' AI's Blind Spot (September 2026) found that all 28 firm fines and penalty agreements in its sample of archived copies of the SRA's recent-decisions page, listed between September 2020 and February 2023, have gone from the SRA's website. Seven of those firms were sanctioned again; the register no longer shows the earlier decision. A person checking the register sees a firm's latest decision, not its record.

**Where people actually look.** Of 56 readable review-site profiles of firms the SRA had fined, rebuked or closed since 2023, none showed the decision, and 55 displayed the SRA's badge. The review platform concerned is listed under the SRA's own voluntary code for comparison sites, and the SRA supplies the data that puts its name on those pages. Asked thirty times for the best conveyancing solicitors in one town, three leading AI assistants put an SRA-fined firm first every time. None of the thirty answers mentioned the fine.

**Table 3. What the public is shown**

| Figure | What it shows | Source |
|---|---|---|
| About 289,000 | Approximate first tier complaints reported by firms, 2013 to 2023 (no 2020 data). Nothing the SRA publishes attributes any to a named firm. | The Complaints Ledger, Aug 2026 |
| 91% | Users of legal services who told the SRA's own research that firm complaints data would help them. | The Complaints Ledger |
| 141 of 151 | Firms audited whose register page says no disciplinary or regulatory decisions are published. | The Complaints Ledger |
| 73 of 131 | Firms for which the Ombudsman search the SRA signposts returned nothing. For all 20 firms in the sample that were revoked, ceased, intervened in or no longer SRA-regulated, no complaints panel appears at all. | The Complaints Ledger |
| 12 months | How long the Legal Ombudsman keeps each decision online. Blind Justice found no published legal or regulatory requirement for it. | The Memory of Justice, July 2026 |
| 11,448 | Ombudsman decision entries counted in five expired official files, no longer on the public record. | The Invisible Ombudsman, July 2026 |
| 9.4% | Ombudsman complaints in 2024/25, 982 of 10,447 received, that led to a published decision. | The Review Gap, April 2026 |
| 28 of 28 | SRA firm fines and penalty agreements in Blind Justice's archived sample, September 2020 to February 2023, since removed from the SRA's website. | AI's Blind Spot, Sept 2026 |
| 0 of 56 | Review-site profiles of firms fined, rebuked or closed since 2023 that show the SRA's decision. 55 show its badge. | AI's Blind Spot |
| 30 of 30 | AI answers that put an SRA-fined firm first for one town without mentioning the fine. | AI's Blind Spot |
| 12 of 13 | 'Top 10' pages on the review platform where at least nine of the ten were paying Premium members. | AI's Blind Spot |
| 0 of 14 | Active firms with five or more Ombudsman decisions that disclose them to prospective clients. | The Review Gap |
| 22 of 22 | Firm websites showing only five-star testimonials; 378 of the 486 testimonials were anonymous. | Online Reviews and the Legal Profession, April 2026 |

Counts were taken on the dates stated in each report; the Complaints Ledger sample is purposive. Absence from a current record is not proof that any particular decision was improperly removed.

The regulator's information exists. It does not reach the public at the moment the public needs it, and much of it is deliberately taken down.

# 5. The people on the other side

Many reports to the SRA come from people who have faced a solicitor across a dispute, some without a lawyer of their own. Of the 76 regulatory-decision cases the Independent Reviewer decided in one year, 34 concerned the solicitor acting for the complainant's opponent. Two of the five decision letters in Taking Their Word For It arose where the person reporting was a litigant in person and the firm reported acted for the other side.

The Government recognises the imbalance when it sees it elsewhere. In the Second Reading debate on the Public Office (Accountability) Bill in the House of Lords on the 1st of September 2026, the minister, Lord Lemos, said: 'Public bodies arrive with experienced lawyers, while families without access to publicly funded support are left to represent themselves, meet the costs personally or turn to crowdfunding. This is a massive and indefensible asymmetry.' People who face a solicitor across a dispute without a lawyer of their own face the same asymmetry, and the regulator is the only body that can hold the other side's lawyer to account.

**Table 4. Redress, and the people without lawyers**

| Figure | What it shows | Source |
|---|---|---|
| 71.9% | Complaints the Legal Ombudsman assessed in 2025/26 in which it found poor service. | The Invisible Ombudsman |
| 46% | Complaints investigated in which the Ombudsman found the firm's own complaint handling poor, first three quarters of 2025/26. | The Complaints Ledger |
| 8,680 | Complaints the Ombudsman dismissed or discontinued under Rule 5.7 in four years, 50.9 per cent of 17,043 listed closures. | The Memory of Justice II, Aug 2026 |
| Not recorded | How many complainants withdrew after being sent an investigator's notice proposing dismissal. | The Memory of Justice II |
| 390 days | Projected Ombudsman waiting time by the end of 2026/27. | The Invisible Ombudsman |
| 17,675 | New Ombudsman complaints forecast for 2026/27, up 174 per cent since 2019/20. | The Complaints Ledger |
| £10,000 | Value up to which defended small money claims go to compulsory mediation, on pain of strike-out or costs, with no duty to negotiate in good faith. | Settle or Be Struck Out, June 2026 |
| 40% | Composite litigant in person cases struck out or dismissed in whole or part because of administrative issues; 30 per cent faced costs orders at least partly caused by administrative failures beyond their control. | Administrative Reliability and Access to Justice, Jan 2026 |
| 34 of 76 | Independent Reviewer regulatory-decision cases that concerned the solicitor acting for the complainant's opponent. | Taking Their Word For It: The Evidence |

The litigant in person figures are drawn from twenty anonymised composite cases and identify patterns; they are not statistically representative of all courts.

Blind Justice's research on litigants in person records the pattern behind those reports. Administrative Reliability and Access to Justice (January 2026), built from twenty composite cases, describes a represented party serving a costs warning estimating defence costs at £50,000 and threatening personal bankruptcy if a claim with merit proceeded; the claimant withdrew. Settle or Be Struck Out (June 2026) sets out accounts from many litigants in person of represented parties attending compulsory mediation and saying almost nothing. The accounts cannot be checked against mediation records, which are confidential. It describes a scheme in which 'None of this requires the represented party to break a single rule.'

The rules allow it because of how they are built. The SRA Principles list seven duties. Acting 'in the best interests of each client' is the seventh. The introduction says that where principles conflict, those that protect the wider public interest take precedence over an individual client's interests. The first Principle refers to the proper administration of justice, but the priority between Principles sits only in that introductory note. It is not framed as a duty in its own right.

The Bar Standards Board's Handbook takes a different approach. Its first core duty is 'You must observe your duty to the court in the administration of justice.' Its second is 'You must act in the best interests of each client.' The Handbook's guidance states that the first 'overrides any other core duty, if and to the extent the two are inconsistent', and its rules state that 'Your duty to act in the best interests of each client is subject to your duty to the court.' For a barrister, the priority of the court over the client is written into the core duties and the rules. A solicitor's duty to the court is real and binding: the first Principle requires the solicitor to uphold the proper administration of justice, and the Code forbids misleading the court. But

the order of priority is left to the introduction, and the client is listed seventh. The question is not whether the duty exists. It is whether the profession's core obligations are stated clearly enough, in the right order, to be enforced.

# 6. The warnings it held and missed

This is not only a failure towards the public. The same method that turns away an ordinary report has let the regulator miss warnings about whole firms, warnings it already held, and the cost has fallen on clients, on the profession that funds the Compensation Fund and on public confidence in both.

**The knowledge it did not join up.** The independent review the SRA commissioned into one collapse, published on the 3rd of September 2026, found that the SRA had recorded the group's main firm as an accumulator firm between January and July 2024 and profiled it as high risk in August 2024. 'That knowledge, however, was fractured. It was distributed across different teams, systems and individuals, and was never drawn together into a single, composite picture of the risk the group presented.' The officer who visited in 2025 was not told of the 2023 investigation. That 2025 investigation was 'closed on the basis of explanations from the [group's] CEO that were not independently verified, even where the acquisition agreements the [officer] had obtained appeared to show those explanations to be incorrect'. Red flags 'that were obvious on their face' were not identified, and it closed with a 'no concerns' finding. A further report in July 2025 raised 'serious questions of financial instability and consumer risk'. The investigation it led to was accepted in early October 2025 as high risk but not urgent. No investigator was assigned until the 30th of January 2026, just before the group collapsed. The review found that 'no one at executive, board or even deputy executive director level was aware or informed of the risks the group posed before February 2026'.

**The explanations it accepted.** At a second collapse, the independent review found that 'The SRA placed its trust in law firms to provide [investigators] with bank statements and a confirmatory letter from the firm's bank', and that 'The SRA accepted the firm's explanation and allowed the firm to continue trading until the full intervention into the firm in October 2023.' The Silenced Canary (May 2026) records that an employee had self-reported concerns about client money in June 2022, and that the SRA investigated in October 2022 but failed to follow its own procedures. At a third, the review found the SRA accepted the firm's assurance about its liabilities 'at face value, despite the contradictory evidence which showed that the firm was in dire financial straits'.

**The data it did not use.** The Governance Blind Spot (May 2026) scanned public register and Companies House data for the 961 regulated firms with three or more offices. It took about 48 hours. It found 62 firms showing two or more indicators drawn from the SRA's own thematic review and the independent reviews of two collapses, and 23 firms linked to 30 other regulated firms, seven of which had lost their authorisation. If the SRA has run an equivalent exercise, it has not published the results.

**The platform it lent its name to.** The Review Gap (April 2026) and The Silenced Canary (May 2026) examined the review platform the SRA endorsed through a pilot programme, and to which it supplies its firm data. A senior SRA director gave a public statement of support. The platform holds negative reviews for up to 48 hours before publication, a delay launched with explicit reference to 'the SRA's pilot for reviews'. By October 2021 it had stopped counting Ombudsman and Tribunal rulings in its rankings. On one collapsed group's main profile the published review count fell from 794 to 759 in 79 days in late 2024, while clients were posting warnings elsewhere. The research does not say how the reviews were removed; it records that they were. The SRA's voluntary code for such sites has no enforcement mechanism, and the accreditation scheme it said it was considering has not appeared.

The pattern is the same as at the front door. The regulator holds the information, accepts the account it is given and does not draw the picture together until a firm has failed. The Legal Services Board estimates client money lost in two of these collapses alone at approximately £100 million.

# 7. Rules applied unevenly

A regulator must apply its rules to everyone in the same way. Blind Justice's research, and the solicitors and lawyers who have come to it, show a regulator whose treatment depends on who is asking.

**Who reports.** The independent review of one collapse found a 'two tier approach'. 'The majority of reports from individual clients of [the firm] were closed without any investigation being carried out, whereas most reports from other sources, such as law firms or a barrister, resulted in at least a desk-based investigation.' A member of the victims' group described 'a very different response from SRA staff' when calling 'under the pretence that they were a solicitor, rather than a member of the public'. One member of staff asked a colleague: 'Do you have any interest in some busy body talking about [the] losses?'

**Who is reported.** Of 67 Tribunal cases since 2015 in which a solicitor gave the SRA false or misleading information, dishonesty was found in 59. The regulator prosecutes individual solicitors who mislead it. In the case below, a firm's statement to the SRA that it now accepts was 'incorrect' and 'material to the original assessment' was found to be a potential breach not serious enough to investigate.

### CASE STUDY A: A SOLICITOR WHO REPORTED A FIRM

A practising solicitor reported a firm to the SRA, with documents, alleging that evidence it disclosed in proceedings was incomplete. In July 2026 the SRA closed the report, recording as its finding on the central allegation that 'The Firm did disclose this exact message, and it was included in the trial bundle at page [X]'. It was not on that page. The SRA's own stage two reviewer had earlier directed further enquiries into the firm's disclosure.

When challenged, the SRA's solicitors wrote that it 'did not have the bundle available to them when taking its decision and therefore did not carry out a side by side comparison of the disclosed documents, nor did it consider this necessary', and that 'our client accepted the firm's position'. The independent complaints reviewer then refused to consider the new evidence: each case 'can only be considered once'.

On reconsideration in October 2026 the firm acknowledged that its statement 'was incorrect'. The SRA found that the statement 'was material to the original assessment and should have been checked before it was provided to the SRA', identified 'a potential breach', and decided that it was 'not sufficiently serious' to investigate. The decision ends: 'there is no right of appeal or review of this decision'.

**What the law says.** The SRA closed a firm's self-report in December 2024, fourteen days after receiving it, on a legal analysis of who may conduct litigation that the Court of Appeal later called 'wrong in law' and that the SRA itself reversed.

**Who may qualify.** The SRA's own published principles for lawyers qualified elsewhere who seek admission as solicitors, dated June 2024, state that 'Periods of professional experience in legal practice which are undertaken either pre or post qualification can be taken into consideration.' Its guidance on applying for an exemption from the second stage of the qualifying examination, updated on the 6th of August 2026, says an applicant's experience is not eligible if 'your experience is pre-qualification (as this is automatically below the threshold level)'. It also confines eligibility to lawyers holding at least one of five listed practice rights. The regulator's guidance excludes what its own principles allow, and lawyers who qualified by other routes, including Chartered Legal Executives, face the stricter test.

### CASE STUDY B: A QUALIFIED LAWYER SEEKING EXEMPTION

A lawyer qualified in England and Wales by another route, with years of practice behind her, applied in May 2024 for exemption from the second stage of the qualifying examination, as the approved rules allow. In May 2025 the SRA refused, treating her experience before qualification as incapable of counting unless it formed a mandatory part of her qualification. An SRA officer had written to her that 'the evidential

threshold is higher for those who do not have all the practice rights'.

In July 2026 an SRA adjudicator allowed her review and sent the application back. The adjudicator found that the guidance would leave the applicant confused, that it had changed shortly after she applied, and that the review officer's report contradicted itself. In October 2026 a new assessor again recommended refusal, on different grounds, without adequately addressing the matters referred back by the adjudicator. On the 1st of October 2026 the Legal Services Board wrote to her that treating pre-qualification experience as incapable of consideration 'does not appear to reflect the wording of the Principles'.

Two and a half years after applying, she has no decision she can rely on. Her latest letter to the SRA's chief executive and its head of authorisation, sent on the 12th of October, has not been acknowledged.

**Who pays.** The SRA's proposals to change compliance officer roles were estimated by the SRA itself to affect 'approximately 1,660 firms', 431 of them run by a sole owner-manager; they have been paused, not withdrawn. On the 14th of October 2026 a motion of no confidence brought by a newly formed alliance of small and boutique firms was kept off the agenda of the Law Society's annual general meeting. Individual practising fees are rising by 17 per cent.

The common thread is not severity or leniency. It is inconsistency: the same regulator that will not check a firm's account for a member of the public, or for a solicitor with the documents in hand, applies its own guidance more strictly than its own principles to a lawyer trying to qualify. A regulator that cannot be predicted cannot be trusted, by the public or by the profession it regulates.

# 8. Why legal regulation underpins everything

Blind Justice believes that good legal regulation underpins everything else. Every regulated sector, and every business that is not regulated at all, asks its lawyers what it can and cannot do. A bank asks before it repossesses. A landlord asks before it refuses a repair. A retailer or a manufacturer asks before it rejects a claim. The answer, and the way it is put to the person on the other side, depends on the standards of the lawyer who gives it.

The people who come to Blind Justice are not only in disputes with lawyers. Many are in disputes with banks, landlords, shops and manufacturers that have ridden roughshod over their complaints and their rights. In case after case the business is advised and represented, and the consumer is not. Section 5 sets out what that looks like in court: a costs warning threatening personal bankruptcy against a claim with merit, and represented parties who attend compulsory mediation and say almost nothing.

Our theory is this. Lawyers who practise without real regulation are emboldened to act as they wish, and so are the businesses they advise. When a regulator accepts a lawyer's account without independently testing disputed material facts, the consequences do not stop with the person who reported them. The same lawyer may be advising or representing a business against an individual who has neither the money nor the knowledge to challenge what is happening, and a report about how that individual was treated is likely to be closed without investigation. Weak legal regulation does not stay inside the legal sector. It is passed on to every consumer in a dispute with a business that has a lawyer.

Voices from within the profession have reached the same conclusion from the other side. Speaking to legal regulators in London in September 2026, Guy Beringer, a former senior partner of a leading City firm, said: 'You might say the profession has tried effectively to outsource its soul to its regulators.' He said that the absence of illegality had 'displaced ethical decision-taking', and that the profession 'cannot expect a regulator to translate the public interest into a set of rules.' Lord Phillips of Sudbury, a solicitor, told the House of Lords in December 2012: 'Sadly, I must be honest and say that I do not actually think that solicitors are any longer members of a profession. I think that we are just another business.'

They are right, and the position is worse than they describe. The profession has handed its ethics to the regulator, and the regulator is not upholding them. Where most people meet it, in a report about a solicitor, the SRA closed 72 per cent of matters in 2024/25 without investigation. That is the most dangerous outcome of all: a profession that looks to the rule book for its ethics, and a regulator that does not test whether the rule book was kept. For most people who report a solicitor, the profession's ethical standards are never tested at all: the report is closed at assessment, and the SRA has published no independent audit of whether it should have been.

That is why this paper is not only about solicitors. Rebuilding the regulation of the legal profession is the most direct way to raise the standard of conduct in every sector that relies on lawyers, and that is every sector.

# 9. Why the system cannot fix itself

The SRA is not short of warnings. Three independent reviews have reported on its handling of three collapses. The Legal Services Board has used its formal powers against it: directions in 2025, given to the Law Society as approved regulator and binding on the SRA, requiring it to strengthen its approach to risk, client money and consumer harm, and a public censure on the 5th of March 2026. In September 2026 it said it was 'disappointed by the standard of leadership and accountability demonstrated by the SRA board in response to the serious regulatory failures that have repeatedly occurred'. On the 3rd of September 2026, having reviewed the SRA's progress against its earlier directions, the Board concluded: 'there is not sufficient evidence to demonstrate that the changes introduced by the SRA are consistently delivering improved outcomes for the public and consumers.' It said it would set additional performance targets.

Targets have not changed the method. The new condition for assessment measures whether a reviewing officer agrees with the case officer. The condition requiring investigators to 'seek independent evidence' applies to investigations, which, on the SRA's own figures, more than four in five reports never reach. The Ministry of Justice's review of the Legal Services Board in July 2026 warned that 'a regulator may meet all procedural "tick-box" requirements while still failing to improve outcomes or reduce harm.'

Blind Justice put its findings to the SRA in open letters from May 2026, with requests for an independent audit of assessment-stage closures. The chief executive's office called the questions 'interesting and important'. The SRA declined to commit to providing the information requested, and has published no such audit. The changes Blind Justice has seen came in one case, after a letter before claim.

The profession pays for the failures. The Compensation Fund that repays clients when firms fail is also paid for by every solicitor, through the practising certificate levy: after one collapse alone, the Fund had paid 92 claims totalling £9.31 million by April 2026, and by the end of August 2026 it was reported to be set to pay out £30 million.

The structure is the problem. The Legal Services Consumer Panel counts eight frontline regulators under one oversight body, each with its own rulebook, while complaints about service go to a separate ombudsman that deletes its decisions after a year. The Legal Services Consumer Panel concluded in July 2026 that 'The current regulatory framework is no longer fit for purpose' and that it is 'structurally incapable of delivering the statutory objectives set out in the Legal Services Act 2007'. The oversight regulator cannot look at an individual case. Nobody in the system is required to answer the person who was turned away.

# 10. Why Parliament must act now

Parliament set the purpose of legal regulation in section 1 of the Legal Services Act 2007. The regulatory objectives include protecting and promoting the public interest, supporting the constitutional principle of

the rule of law, improving access to justice and protecting and promoting the interests of consumers. A regulator that closes most reports without recording any check of what it is told, gives the public no right to a second look and lets its record of misconduct disappear from view is not meeting those objectives. In the case it has now reopened, it did not meet them until it faced a threatened judicial review. Parliament has been warned before about passing laws that people cannot use. In the House of Lords in March 2015, Lord Phillips of Sudbury said it was 'almost a case of defrauding the public for us to go on as we do, enacting legislation for which we make all sorts of claims while knowing that so many of our countrymen will not get near to exercising those rights.'

The answer offered to every call for structural reform is that there is no parliamentary time. Parliament makes time when the case is undeniable. The Post Office (Horizon System) Offences Act 2024 was introduced on the 13th of March 2024 and received Royal Assent on the 24th of May 2024, ten weeks later, once the scale of the failure could no longer be denied. The case for rebuilding the regulation of solicitors is now set out in the regulator's own admissions, in three independent reviews, in the oversight body's censure and in ten months of published research.

Parliament has done this before. Until 2007 the Law Society both represented and regulated solicitors. The 2004 independent review of the regulatory framework for legal services found 'a conflict of interest between the two roles' and concluded: 'In a regulatory body the public interest should have primacy.' The Legal Services Act 2007 separated regulation from representation and required the Legal Services Board to make rules keeping them apart (section 30). That reform moved the regulator away from the profession. It did not make the regulator answer to the public. Five years after the Act, in a House of Lords debate on the regulation of the legal profession, Lord Phillips of Sudbury said that 'we are not at the point where we are doing the regulatory process the best we can', and that 'going back to the drawing board … might well be what is needed.' The 2020 independent review of legal services regulation recommended a single regulator for the whole sector, set up at arm's length, reporting to Parliament, and an end to the role of professional bodies in regulation. In Scotland, the 2018 independent review recommended a single independent regulator. The Regulation of Legal Services (Scotland) Act 2025 instead kept the Law Society of Scotland as regulator, with a regulatory committee required to act independently. England and Wales should take the step Scotland did not.

Waiting has a cost. Every month the SRA receives more than a thousand reports, and on its own figure most are never investigated. Most of those will be rightly closed. Some will not, and the people who made them will be told, in the regulator's standard words, that there is no right of appeal or review.

# 11. What must happen

Parliament must legislate in this session to rebuild the regulation of solicitors. The recommendations below are what that legislation must contain, how decisions must be made under it and how the new regulator must answer to the public. The last three set out what must start now, while the Bill goes through.

**THREE DEMANDS**

1. Open the closed files. An independent, published audit of reports closed at assessment, starting with the latest year, and a route back for anyone whose report was closed on the account of the person reported alone (recommendations 11 and 18).

2. Give the public the right to challenge the regulator. A statutory right to require an independent review of a decision not to investigate, decided by someone with no part in it, against an evidence test and with full reasons (recommendations 3, 6, 7 and 9).

3. Rebuild the regulator. Legislation for a single regulator independent of the profession and of government, answerable to Parliament, with the profession's core principles rebuilt so that the court comes first and the client second (recommendations 1, 2, 4, 5 and 13).

## A NEW STRUCTURE

**1. One regulator, independent of the profession and of government.** Replace the SRA and the other frontline legal regulators with a single regulator for all legal services in England and Wales, independent of the professional bodies and of ministers, with a board appointed through an open public process and a lay majority. The Legal Services Consumer Panel called for a single regulator in 2026, and the independent review of legal services regulation recommended one in 2020. Regulation must not return to the profession's representative bodies. That was the arrangement Parliament ended in 2007, for good reason.

**2. One place for complaints.** Bring service complaints, now handled by the Legal Ombudsman, and conduct reports, now handled by each regulator, into the single regulator, so that a person reports once and the record of what happened stays with the firm. The SRA signposts consumers to the Ombudsman for firm complaint records; the Ombudsman deletes its decisions after twelve months. The SRA points to the Ombudsman, the Ombudsman's record expires, and the public is left with neither. Service complaints must still be decided independently: the ombudsman function must sit within the single regulator as a separate adjudicator, with its own decision makers and binding redress powers, so that the body that regulates a firm is never the body that judges a complaint about its own decisions.

**3. A statutory right of review for the public.** Give any person who reports a solicitor the right to require a formal review of a decision not to investigate, on the same grounds the solicitor already has: that the decision was materially flawed, or that new information would have changed it. The review must be decided by someone who had no part in the decision, with a further independent merits stage for contested closures. The person reported already has a review right over every decision taken against them. The person who reported must have one too.

**4. Rebuild the core principles: the court first, the client second.** Restructure the principles that bind every solicitor on the model of the Bar Standards Board's core duties. The duty to the court must come first and be stated as a rule that overrides any inconsistent duty. The duty to act in the best interests of each client must come second, subject to the duty to the court and to the other public interest duties. Every other principle follows. The client must be the solicitor's first obligation after the court, not the seventh.

**5. A core duty of fairness to people without a lawyer.** Make it a core principle, enforceable on its own, that a solicitor must not take unfair advantage of a person who is not legally represented, whether by threats of costs out of proportion to the claim, by misstating the law or procedure, or by using the other side's lack of

representation to pressure them into abandoning a claim. The Code already says 'You do not abuse your position by taking unfair advantage of clients or others.' It is one line among the Code's standards. It must become a principle, and it must name the people it most needs to protect.

## HOW DECISIONS ARE MADE

**6. An evidence test before any report is closed.** No report may be closed on the account of the person reported alone. Where a source outside that person exists, the regulator must test the account against it before closing. Where it decides no check is needed, it must say why. No report may be closed on an explanation the regulator has supplied itself, and no altered document may be relied on until the original has been obtained.

**7. Reasons for every decision.** Every decision not to investigate must give reasons addressing each element of the report, state what was verified, against what and when, and state where any fact relied on came from. The SRA has admitted that it failed to give sufficient reasons. In 2017 it told an enquirer: 'Where we close a file after assessment we don't record a reason electronically.'

**8. The person who reported sees the answer.** Before a report is closed on the strength of the solicitor's response, the person who reported must be shown the substance of that response and given a fair chance to answer it. The SRA's own guidance on gathering evidence shows why. In its published example, a solicitor's explanation that was 'plausible, but not entirely convincing' was checked with the person who reported, who produced documents proving it was misleading.

**9. A fresh decision maker for every second look.** Any reconsideration, review or complaint about a decision must be decided by someone who had no part in it, and must never be referred back to the officer whose decision is in question.

## OPENNESS AND ACCOUNTABILITY

**10. Publish the figures on decisions not to investigate.** Publish every year the number of reports closed at assessment, the reasons, the source of the information relied on, how often the account of the person reported was independently tested, how many reviews were requested and how many changed the outcome, broken down by who reported.

**11. An independent audit of closed reports.** Commission an independent audit each year of a random sample of reports closed without investigation, published in full, measuring whether the account relied on was verified. The SRA's present quality measure for assessment is whether two officers agree.

**12. Decisions shown wherever a solicitor is listed or rated.** Keep every disciplinary and regulatory decision on the public register for as long as the solicitor or firm practises, and for a period proportionate to its seriousness after, with a firm's full record shown, not only its latest decision. Publish decisions as open data, and require any comparison or review site that displays the regulator's name or badge to display its decisions beside it.

**13. Answer to Parliament every year.** Require the regulator's chair and chief executive to give evidence to the Justice Committee once a year on the quality of decisions not to investigate, the review figures and the audit.

**14. Join up what it knows about a firm.** Require the regulator to hold one risk picture for each firm and group, drawing together reports, investigations, intelligence, complaint data and public warnings, available to every officer at the point of decision, with defined criteria that escalate accumulating concerns to the executive and the board. The review of one collapse found that no one at that level knew until the group had failed.

**15. Apply the rules as approved, to everyone.** Treat a report the same way whoever makes it. Apply authorisation and qualification criteria only as approved by the oversight regulator, publish them in full,

and never let guidance impose a restriction the approved rules do not contain. Every refusal of authorisation or exemption must give reasons tied to the approved rule and be open to review by someone independent of the original decision.

## WHILE PARLIAMENT LEGISLATES

**16. The SRA must change its own rules now.** Recommendations 3, 6, 7, 8 and 9 need no Act of Parliament. The SRA can amend its own review rules to give reporters a right of review, require verification and reasons before closure, show reporters the response they are answering and route every second look to a new decision maker. It must do so now, and the Legal Services Board must approve the changes without delay.

**17. The Legal Services Board must use the powers it has.** The Law Society is the approved regulator under the Legal Services Act 2007, and the SRA exercises its regulatory functions by delegation, so the Board's powers are exercised in respect of the Law Society. The Act already lets the Board set performance targets (section 31), give directions (section 32), publicly censure (section 35), impose financial penalties where directions are not complied with (section 37), take over a regulatory function by intervention direction (section 41) and recommend that the Law Society's designation as an approved regulator be cancelled (section 45). It used section 32 in 2025, directing the Law Society 'through its delegated regulatory body the SRA'. It should do so again now, directing the Law Society to secure that the SRA closes no report on the account of the person reported alone, tests disputed material facts against an independent source, and keeps an auditable record of what was verified and why each report was closed. If that is not done, the Board must use the powers that follow.

**18. A route back for people already turned away.** Commission an independent review of reports closed at assessment since the present process began in 2018/19 where the decision rested on the account of the person reported, and offer every person whose report was closed that way the chance to ask for it to be looked at again.

# 12. What happens next

Blind Justice will send this paper, in the week it is published, to the Chair of the Justice Committee, the Lord Chancellor, the Legal Services Board, the Legal Services Consumer Panel and the SRA.

It asks the Justice Committee to take evidence on the regulation of solicitors, including from people whose reports were closed without investigation, before the end of this session.

It asks the Ministry of Justice to commit, within three months, to legislation establishing a single independent regulator containing recommendations 1 to 15.

It asks the SRA to publish, within twenty-eight days, a timetable for adopting recommendations 3, 6, 7, 8 and 9 under its own rules, and the Legal Services Board to state, in the same period, whether it will direct them.

Blind Justice will publish every reply it receives.

From the day this paper is published, Blind Justice is asking anyone whose report to the SRA was closed without investigation, and any solicitor whose concerns about a firm were turned away, to send it the decision letter. Letters will be anonymised and used only with consent. Blind Justice will read every one on a published method: whether the reasons address each allegation, what verification is recorded, and what happened when the decision was challenged. Letters people choose to send are not a statistical sample, and Blind Justice will not present them as one. They will show the Justice Committee, in the words of the regulator's own decisions, what the figures in this paper mean for the people behind them.

This is not a campaign against solicitors. The profession pays for the regulator's failures, through the Compensation Fund and its fees, and the solicitors who have come to Blind Justice want a regulator that does its job. Public accountability is a cause the public and the profession share.

# Annex A: the case in documents

The chronology below sets out the case described in section 1, from the record Blind Justice holds and from the SRA's own account of it in its response of the 22nd of October 2026, which is reproduced in Annex B.

**Table 5. Chronology**

| Date | What happened | Record |
|---|---|---|
| 20 January 2026 | Blind Justice's founder reports concerns about a solicitor to the SRA, with publicly available material. | Report to the SRA; SRA response, para 1 |
| 10 March 2026 | An investigation officer decides not to investigate. The letter presents assertions about the solicitor's history as settled facts. | First decision |
| After 10 March 2026 | Blind Justice asks six questions about what was verified. The SRA declines to answer them. | Correspondence |
| 8 April 2026 | Blind Justice writes to the chief executive, naming the case and setting out that the decision presented unverified assertions as settled facts. | Letter to the chief executive |
| April 2026 | The reply comes from the officer who made the decision: the chief executive 'has passed it on to me'. | SRA reply |
| 13 April 2026 | The SRA tells Blind Justice it will contact the solicitor for an explanation. | SRA response, para 4 |
| 15 September 2026 | The same officer decides a second time not to investigate, after asking the solicitor for an explanation. | Second decision |
| 30 September 2026 | Blind Justice sends a letter before claim for judicial review. | Letter before claim |
| 22 October 2026 | The SRA, through its solicitors, accepts three failings, agrees to withdraw both decisions and to reconsider the whole report through a new decision maker, and confirms it 'did not carry out formal checks'. | SRA response, paras 23 to 27 and 30 |

Dates are taken from the documents named. No proceedings have been issued and no court has ruled on either decision.

# Annex B: the SRA's response of the 22nd of October 2026

This is the formal response sent on behalf of the SRA by its solicitors to Blind Justice's letter before claim, in the redacted form released to journalists on the 22nd of October 2026. Redactions in square brackets cover the identity of the solicitor, his firm and all other third parties, and the factual particulars of the concerns and of grounds 1 to 3, each of which could identify the solicitor. For this paper the names of the SRA's solicitors and of the signatory, the names of judges and of the individual parties to the cases cited, reference numbers and addresses have also been removed. Everything else is reproduced as sent, including paragraph numbering. Paragraphs 10 and 11 are withheld in full.

### RESPONSE TO A LETTER BEFORE CLAIM IN PROPOSED JUDICIAL REVIEW PROCEEDINGS

We refer to your letter before claim dated 30 September 2026, which was received by the SRA after close of business on 30 September 2026 and is treated as received on 1 October 2026. This letter is a formal response to that letter and is set out in accordance with the Pre-Action Protocol for Judicial Review under the Civil Procedure Rules 1998. You initially requested a response by 15 October 2026, and you subsequently offered, by email dated 7 October 2026, an extension to 5pm on 22 October 2026.

The Claimant: you are the Claimant in this matter. The Defendant: Solicitors Regulation Authority. From: [the SRA's solicitors], acting on behalf of the SRA.

### THE DETAILS OF THE MATTER BEING CHALLENGED

1. You take issue with the Defendant's decision dated 10 March 2026 ('the 1st Decision') not to investigate your report dated 20 January 2026 ('the Report') in respect of [the solicitor] ('the Solicitor').

2. On 10 March you emailed the Defendant raising further points and asking if the Decision was final or whether it would be reconsidered in light of the points raised.

3. On 8 April 2026 you raised a complaint with the Defendant about the handling of the Report.

4. On 13 April 2026 the Defendant communicated to you that they would be contacting [the Solicitor] for an explanation.

5. The Defendant communicated to you by email on 15 September 2026 that following enquiries with [the Solicitor] there would be no further investigation ('the 2nd Decision').

6. You have asked for the Defendant:

> a. To withdraw the 2nd Decision and reconsider the Report, and for that to be completed by a decision maker not previously involved, testing the Solicitor's account against the SRA register, the court records for the appearances he relies on, and the live claims on his law firm's website. You have asked for reasons to be given that address each.
>
> b. To identify in writing the 'established processes' referred to on 30 September 2026, the rule or published policy creating it, and who may invoke it; or, if no such process exists, to say so.
>
> c. To explain what effective means presently exist by which a person who has made a report may seek reconsideration on the merits of a decision not to investigate and, if the Defendant's position is that no such means exists, to explain how it says the absence of that safeguard is consistent with the lawful operation of the assessment process described above.

7. In the absence of the above, you have indicated that you seek an order quashing the 2nd Decision and remitting the Report for reconsideration in accordance with the court's judgment.

8. You have indicated that you reserve the right to seek declaratory relief on ground 4 (set out below) and such further relief as the court considers appropriate.

## SUMMARY OF FACTUAL BACKGROUND

9. In the Report you expressed concerns regarding the Solicitor. [Paragraphs 10 and 11 redacted.]

12. The Report was assessed by the Defendant by:

> a. Reviewing the evidence provided with the Report; b. Considering the SRA's Principles and Code of Conduct for Solicitors. c. Applying the SRA's Assessment Threshold Test and Enforcement Strategy to this case; d. Making enquiries with the Solicitor. This took place between the 1st Decision and the 2nd Decision.

13. The 1st Decision was made on 10 March 2026. This was a decision not to investigate.

14. The 2nd Decision that there would be no further investigation was made on 15 September 2026.

15. You have set out the following grounds in your letter before claim:

> Ground 1: 'Failure to take reasonable steps to acquaint itself with the relevant material'. [Particulars redacted.]
>
> Ground 2: 'Irrationality'. [Particulars redacted.]
>
> Ground 3: 'Failure to give adequate reasons'. [Particulars redacted] … neither the Claimant nor the public can tell from the reasons given whether the material points were considered and rejected or were not considered at all.
>
> Ground 4: 'In the alternative: unlawful practice'. You state that the Claimant's primary case is that the 2nd Decision was unlawful for the reasons in grounds 1 to 3. In the alternative, you

> state that the Claimant will contend that the 2nd Decision was taken under a practice which sanctions the closure of a report on the untested account of the person reported and treats further enquiry as unwarranted, and that such a practice is unlawful because, in a material and identifiable number of cases, it will produce decisions taken without the enquiry the law requires.

## RESPONSE TO THE PROPOSED CLAIM

16. The Defendant is the independent regulatory body of solicitors and law firms pursuant to arrangements made in accordance with the Legal Services Act 2007. The statutory, regulatory and disciplinary functions of the Law Society in relation to solicitors in England and Wales have been delegated to the Defendant. The Defendant's role is to act in the public interest by setting, promoting and securing the standards of conduct and professional performance in solicitors which are necessary to ensure that clients receive a good standard of service and the rule of law is upheld.

17. In the course of their work, the Defendant receives and obtains large amounts of information and intelligence regarding solicitors and solicitors' practices which they will analyse and then determine what, if any, steps need to be taken in response to this information. This process involves consideration of how protection of the public interest is best served, allowing the defendant to allocate their resources in a proportionate way. The Defendant's focus is on regulation of the regulated community in the public interest.

18. The Defendant applies their published Enforcement Strategy in making such decisions. Paragraph 2.1 of the Enforcement Strategy explains their approach to enforcement. The Defendant focuses their action on the most serious issues and takes into account any aggravating and mitigating factors, whilst ensuring that the wider public interest is upheld.

19. The Enforcement Strategy makes clear that not every referral will lead the defendant to open an investigation. In addition, if the Defendant is of the view that, based on the totality of the evidence, they will be unable to obtain a finding of misconduct, the Defendant is entitled to close the matter without taking further action.

20. The Defendant also applied their Guidance on Making Decision to Investigate Concerns ("the Guidance") which states that:

> "When we receive a complaint or report we assess the information brought to our attention by applying a three-stage test, called our Assessment Threshold Test. This helps us decide if we should investigate. The ATT is: 1. Has there been a potential breach of the SRA's standards or requirements based on the allegations made? 2. Is that breach sufficiently serious that, if proved, is capable of resulting in regulatory action? 3. Is that breach capable of proof? A complaint or report will only pass the Assessment Threshold Test, and be investigated further, where the answer to all three stages of the test is 'yes'."

21. Where a regulator's decision not to take further action is challenged, the starting principle is that the Courts acknowledge that regulators should be given a wide discretion in the exercise of their functions. Whilst the defendant is not immune from judicial review, they refer the claimant to the observations of the Court of Appeal in R ([name redacted]) v Securities and Futures Authority, 20th June 1994 (unreported) where [the Master of the Rolls] stated:

> "Recognition of that jurisdiction must in my judgment be combined with a recognition that the clear intention of [the Act] is that the bodies established under the Act should be the regulatory bodies and it is not the function of the court in anything other than a clear case to second guess their decisions or, as it were, to look over their shoulder. The position that I think we end up with is that these bodies are amenable to judicial review but are, in anything other than very clear circumstances, to be left to get on with it. It is for them to decide on the facts

> whether it is, or is not, appropriate to proceed against a member as not being a fit and proper person and it is essentially a matter for their judgment as to the extent to which a complaint is investigated"

22. In [2011] EWHC 3259 (Admin), [the judge] followed and applied [that case] in the context of an application for judicial review concerning the defendant's decision not to take action against a solicitor.

## SUMMARY OF THE SRA'S POSITION

23. The SRA's Application, Notice, Review and Appeal Rules ('the ANRARs) do not permit an appeal by you against the Decision. The ANRARs confirm:

> 3.1 The SRA may: (a) where an administrative error in, or in relation to any decision comes to the SRA's attention, correct the error without the need to undergo a review under this Part; (b) review all or part of any regulatory decision reached by it, of its own initiative, under this Part.

24. The ANRARs do not permit an application by you for a review of such a decision.

25. The gateway for information to be provided to the SRA which might be relevant to a review is the SRA's Complaints Policy, which confirms:

> 'Regulatory decisions. If you think our regulatory decision about a person or firm who we regulate is wrong, speak to the team you have been dealing with. A regulatory decision is a decision we have made about the rules solicitors and law firms must follow. Tell the team why you think the decision is wrong or if you have new information. The team will tell you if the decision can be reviewed. Reviews are not part of our complaints policy. Review means looking back to check if we made the right regulatory decision. The team cannot look at regulatory decisions if they are more than one year old, unless there is a really good reason to.'

26. The Defendant accepts that:

> 23.1 It treated the Report as being narrower in scope than it actually was. The Defendant's considerations at the ATT stage were therefore too narrow.
>
> 23.2 Having determined to carry out some enquiries between the 1st Decision and the 2nd Decision, those enquiries were not detailed enough.
>
> 23.3 By virtue of the Report being considered in the manner set out above, insufficient reasons were given for the 2nd Decision.

27. The Defendant agrees to withdraw the 1st Decision and the 2nd Decision and to reconsider the Report, and for that process to be completed by a decision maker not previously involved. The SRA agrees that reasons should subsequently be given that address each element of the Report.

## DETAILS OF ANY OTHER INTERESTED PARTIES

28. The Solicitor is an Interested Party.

## ALTERNATIVE DISPUTE RESOLUTION PROPOSALS

29. The Defendant notes that you remain willing to consider ADR and at this stage suggests you await the outcome of the fresh consideration of the Report.

## RESPONSE TO REQUESTS FOR INFORMATION AND DOCUMENTS

30. The Defendant's response to your requests for information is set out below:

> a. You have requested the identity and grade of the decision maker on the 10th of March and the 15th of September 2026, and any supervisory approval given. The 1st Decision was made by [name redacted], SRA Investigation Officer. The 2nd Decision was made by [name

redacted], SRA Investigation Officer. The 1st Decision and the 2nd Decision were made under the supervision of [name redacted].

b. You have requested [the officer's] letter to the Solicitor and the Solicitor's response, redacted only so far as strictly necessary. The Defendant has proactively disclosed the relevant information from its enquiries and provided its reasoning. No further disclosure is required by way of the duty of candour, including of [the officer's] letter to the Solicitor and the Solicitor's response.

c. You have requested the assessment record, including the application of the Assessment Threshold Test (ATT) to the Report. Please find attached: Appendix 1, Assessment Plan. Please note that the Assessment Plan contains internal comments that do not form part of the assessment in this case. [Appendix 1 is not reproduced.]

d. You have asked for confirmation of what, if anything, the Defendant did to check whether the solicitor holds or has held a [type redacted] qualification. The Defendant did ask the Solicitor about the [type redacted] qualification but did not carry out formal checks of the Solicitor's [type redacted] qualification.

e. You have asked for information about any policy, guidance or procedure governing the reconsideration of a decision not to investigate where new information or evidence of material flaw is provided. Under the Defendant's service complaint policy, they can review a file to ensure that they have not seriously failed in their work. Your attention is drawn to Sections 7 and 8. The Defendant can consider whether there has been a material flaw in their decision-making or if they think there is new information which may affect the decision. If so, the complaints team would refer the matter back for further consideration.

f. You have asked for information about the Defendant's quality assurance procedure for decisions not to investigate and the proportion of such decisions subject to it. Quality control takes place via a process whereby dip samples are reviewed each month.

g. Confirmation that all records relating to [the two case references] are preserved. The Defendant's relevant employees have been reminded that all records relating to [the two case references] are to be preserved.

h. You have asked for copies for any internal record, instruction, referral or correspondence generated as a result of the Claimant's letter of 1 September 2026 or the Defendant's response of 30 September 2026, in so far as it concerns the existence, availability or operation of the 'established processes' referred to in that response. There are no documents to disclose under this heading.

31. [Address for service redacted.] Yours sincerely, [name redacted], for [the SRA's solicitors].

# Evidence and method

**Sources.** This paper draws on Blind Justice UK's fifteen published research reports, from Administrative Reliability and Access to Justice (January 2026) to AI's Blind Spot (September 2026): The Review Gap and Online Reviews and the Legal Profession (April 2026); The Governance Blind Spot, The Silenced Canary and The Complaints Black Hole (May 2026); Settle or Be Struck Out (June 2026); The Memory of Justice and The Invisible Ombudsman (July 2026); The Memory of Justice II and The Complaints Ledger (August 2026); A Law Unto Themselves?, Taking Their Word For It and its evidence file, and No Further Questions (September 2026). The 2024/25 figures are from the SRA's Investigations and enforcement annual report 2024/25 (published October 2026), tables on reports of concern and on reviews of sanctions and controls. Other figures are taken from those reports as published, with their caveats, and from the press reports, regulator statements and correspondence cited: the Law Society Gazette (3rd of September and 14th of October 2026) and Legal Futures (3rd of September 2026).

**The SRA's response.** The SRA's formal response of the 22nd of October 2026 to Blind Justice's letter before claim of the 30th of September 2026 is reproduced in Annex B from the version released to the press, with the further redactions described there. The chronology of correspondence with the SRA's chief executive was supplied to journalists on the 22nd of October 2026 and published on the Blind Justice website on the 23rd of October 2026. Every quotation in the paper is sourced in the source notes that follow.

**Law and reviews.** Legal Services Act 2007, sections 1, 27 to 32, 35, 37, 41 and 45; SRA Principles and Code of Conduct for Solicitors; SRA Application, Notice, Review and Appeal Rules; Bar Standards Board Handbook, core duties 1 and 2, gC1.1, rC3 and rC4; Review of the Regulatory Framework for Legal Services in England and Wales (December 2004); Independent Review of Legal Services Regulation (June 2020); Fit for the Future (October 2018) and the Regulation of Legal Services (Scotland) Act 2025; Legal Services Consumer Panel, Position Paper: A Regulatory Framework for the Future (July 2026); the independent reviews of three firm collapses and the Legal Services Board's statements of the 5th of March and the 3rd of September 2026.

**Names.** No solicitor, firm or individual official is named. Firms are described, and the independent reviews are cited by subject.

**Limits.** The decision letters Blind Justice has read are a set gathered from people who came to it, not a sample. They show how decisions are made and recorded; they are not a measure of how often anything happens across all SRA decisions. Silence in a decision about a step is not proof the step was not taken, and the SRA cautions that receipts and disposals in a year are not always the same cases. The SRA's admission of the 22nd of October concerns one case. No court has ruled on the decisions the SRA has agreed to withdraw, and nothing in this paper is a finding against any solicitor.

**Interests.** Blind Justice UK is a registered charity. Its founder, Edward Romain, made the report the SRA has now reopened and sent the letter before claim. He chairs the Legal Panel of WhistleblowersUK, which supports the challenge. He is an Associate of the Chartered Institute of Legal Executives working towards practice rights, and so has an interest in how qualification routes are applied. Blind Justice has no commercial relationship with any regulator or review platform, or with any firm discussed in its research.

# Source notes

Each quotation in the paper is listed below against the document it comes from, with the paragraph or page where the document has one. The three independent reviews are identified by subject and date rather than by firm. Documents marked 'held by Blind Justice' are correspondence and decisions on file; Blind Justice's own reports are cited by title and month of publication.

**Table 6. Sections 1 to 4**

| Section | Quoted words or figure | Source |
|---|---|---|
| 1 | 'It treated the Report as being narrower in scope …'; 'not detailed enough'; 'insufficient reasons' | SRA response, 22nd of October 2026, para 26 (Annex B) |
| 1 | 'The ANRARs do not permit an application by you …'; 'of its own initiative' | SRA response, paras 23 and 24; SRA Application, Notice, Review and Appeal Rules, rule 3.1(b) |
| 1 | 'a decision maker not previously involved'; 'that address each element of the Report' | SRA response, para 27 |
| 1 | 'but did not carry out formal checks'; 'dip samples are reviewed each month' | SRA response, paras 30(d) and 30(f) |
| 2 | 15,914; 14,420; 10,382; 2,673; 1,763; 37.3 per cent | SRA, Investigations and enforcement annual report 2024/25 (October 2026), reports of concern and high-level outcomes, 2018/19 to 2024/25 |

| Section | Quoted words or figure | Source |
|---|---|---|
| 2 | Worked examples: 0 of 11, 11 of 14 | SRA case studies for people reporting a solicitor, 23rd of May 2024; Taking Their Word For It: The Evidence (September 2026) |
| 2 | 'Given the explanation provided by [the solicitor] …' | SRA decision email, 15th of September 2026, held by Blind Justice; Taking Their Word For It (September 2026) |
| 2 | 'Aside from the information provided by our [internal] team …' | SRA complaints manager to Blind Justice, 2026, held by Blind Justice; Taking Their Word For It |
| 2 | 'In the alternative, the Court may have granted him a right of audience.' | SRA decision letter, held by Blind Justice; No Further Questions (September 2026) |
| 2 | 43 of 67; 32; 11; 8 | Solicitors Disciplinary Tribunal judgments since 2015, screened in Taking Their Word For It: The Evidence |
| 2 | 'It is not enough to provide a whistleblowing procedure …' | Hansard, HL Deb 1st of September 2026, Public Office (Accountability) Bill, Second Reading, vol 859 col 70 (Baroness Featherstone) |
| 2 | 'placed its trust in law firms' | Independent review of the SRA's regulation of [the first firm], for the Legal Services Board, published 29th of October 2024, para 102 |
| 2 | 'placed the onus on complainants to provide it with evidence' | Independent review of the SRA's regulation of [the second firm], for the Legal Services Board, published 16th of October 2025, para 26 |
| 2 | 'at face value, despite the contradictory evidence' | Independent review of the SRA's regulation of [the second firm], for the Legal Services Board, published 16th of October 2025, paras 22 and 159 |
| 2 | 'the SRA taking the [firm's] explanations at face value and opting not to investigate further' | Independent review of the SRA's handling of [the group], for the SRA, dated 2nd and published 3rd of September 2026, para 5.5 |
| 2 | 'over-reliance on information provided by [the firm] itself, rather than independent verification' | Legal Services Board, announcement of its public censure of the SRA, 5th of March 2026 |
| 2 | Approximately £100 million | Legal Services Board, statement of the 3rd of September 2026 |
| 2 | 90 per cent agreement between two officers | SRA, performance targets to meet the conditions, 12th of March 2026, condition 3.3 |
| 3 | 'Under the SRA Application, Notice, Review and Appeal Rules, there is no right of appeal or review …' | SRA decision letters held by Blind Justice; No Further Questions |
| 3 | Formal review rights for specified decisions affecting solicitors and firms; none for a closed report | SRA Application, Notice, Review and Appeal Rules, rule 3.2 and Annex 1; A Law Unto Themselves? (September 2026) |
| 3 | 'If we agree this is the case, then we can review the decision …' | SRA complaints policy, as updated July 2025; A Law Unto Themselves? |
| 3 | 'The team will tell you if the decision can be reviewed …' | SRA response, para 25, quoting the SRA's current complaints policy |
| 3 | '[The chief executive] has passed it on to me in the Investigations directorate.' | SRA investigation officer to Blind Justice, April 2026, held by Blind Justice |
| 3 | 'I have not undertaken new enquiries …' | SRA stage two complaint outcome, September 2026, held by Blind Justice |
| 3 | 'cannot review or overturn any regulatory decisions' | SRA complaints policy; A Law Unto Themselves? |
| 3 | 76 of 94; 34 of 76 (section 5) | Independent Reviewer of Complaints, annual report for 1st of November 2023 to 31st of October 2024, SRA Board papers, June 2025, pages 4 and 6 |
| 3 | 'does not have jurisdiction to review approved regulators' decisions …' | Legal Services Board public guidance; A Law Unto Themselves? |

| Section | Quoted words or figure | Source |
|---|---|---|
| 3 | ‘provides no mechanism to make sure that a whistleblowing report is investigated …’ | Hansard, HL Deb 2nd of December 2022, Protection for Whistleblowing Bill [HL], Second Reading, vol 825 cols 2027 to 2028 (Baroness Kramer) |
| 3 | No successful judicial review found; two attempts certified totally without merit | Searches reported in A Law Unto Themselves? and Taking Their Word For It: The Evidence; searches not exhaustive |
| 3 | 564; 86.7 per cent | SRA Board paper on corporate complaints, para 11; Taking Their Word For It: The Evidence |
| 3 | 69 reviews; 28 successful; 4 in part | SRA, Investigations and enforcement annual report 2024/25, reviews of SRA decisions, sanctions and controls |
| 4 | ‘There are no disciplinary or regulatory decisions currently published about this firm’ | SRA register, as recorded in The Complaints Ledger (August 2026) |
| 4 | ‘Most published decisions are removed from our website three years …’ | SRA policy on publishing regulatory and disciplinary decisions; AI’s Blind Spot (September 2026) |

Blind Justice reports are cited by title and month of publication.

**Table 7. Sections 5 to 7**

| Section | Quoted words or figure | Source |
|---|---|---|
| 5 | ‘None of this requires the represented party to break a single rule.’ | Settle or Be Struck Out (June 2026) |
| 5 | ‘Public bodies arrive with experienced lawyers …’; ‘a massive and indefensible asymmetry’ | Hansard, HL Deb 1st of September 2026, Public Office (Accountability) Bill, Second Reading, vol 859 col 29 (Lord Lemos, Minister) |
| 5 | ‘in the best interests of each client’; priority of the public interest | SRA Principles, introduction and Principle 7 |
| 5 | First Principle; duty not to mislead the court | SRA Principles, Principle 1; SRA Code of Conduct for Solicitors, para 1.4 |
| 5 | ‘You must observe your duty to the court …’; ‘You must act in the best interests of each client.’ | Bar Standards Board Handbook, core duties CD1 and CD2 |
| 5 | ‘overrides any other core duty, if and to the extent the two are inconsistent’ | Bar Standards Board Handbook, guidance gC1 |
| 5 | ‘Your duty to act in the best interests of each client is subject to your duty to the court.’ | Bar Standards Board Handbook, rule rC4; see also rC3 |
| 6 | Accumulator firm, January to July 2024; high risk, August 2024 | Independent review of the SRA’s handling of [the group], for the SRA, dated 2nd and published 3rd of September 2026, para 4.2.1 |
| 6 | ‘That knowledge, however, was fractured …’; officer not told of the 2023 investigation; ‘no one at executive, board or even deputy executive director level …’ | Independent review of the SRA’s handling of [the group], for the SRA, dated 2nd and published 3rd of September 2026, para 4.2.2; visit of the 27th of March 2025 at para 5.81 |
| 6 | ‘closed on the basis of explanations from the [group’s] CEO …’; ‘that were obvious on their face’; ‘no concerns’ | Independent review of the SRA’s handling of [the group], for the SRA, dated 2nd and published 3rd of September 2026, para 4.3.3 |
| 6 | ‘serious questions of financial instability and consumer risk’; high risk but not urgent; investigator assigned 30th of January 2026 | Independent review of the SRA’s handling of [the group], for the SRA, dated 2nd and published 3rd of September 2026, para 4.3.4; see also para 5.112 |
| 6 | ‘The SRA placed its trust in law firms to provide [investigators] with bank statements …’ | Independent review of the SRA’s regulation of [the first firm], for the Legal Services Board, published 29th of October 2024, para 102 |
| 6 | ‘The SRA accepted the firm’s explanation and allowed the firm to continue trading …’ | Independent review of the SRA’s regulation of [the first firm], for the Legal Services Board, published 29th of October 2024, para 394 |
| 6 | Self-report of June 2022; investigation of October 2022 | The Silenced Canary (May 2026) |

| Section | Quoted words or figure | Source |
|---|---|---|
| 6 | ‘at face value, despite the contradictory evidence which showed that the firm was in dire financial straits’ | Independent review of the SRA’s regulation of [the second firm], for the Legal Services Board, published 16th of October 2025, para 159 |
| 6 | 961 firms; 62 firms; 23 firms linked to 30 | The Governance Blind Spot (May 2026) |
| 6 | ‘the SRA’s pilot for reviews’; 48-hour delay; 794 to 759 | Review platform announcement, 2nd of June 2021; The Review Gap (April 2026); The Silenced Canary |
| 7 | ‘two tier approach’; ‘a very different response from SRA staff’; ‘under the pretence that they were a solicitor …’; ‘Do you have any interest in some busy body …’ | Independent review of the SRA’s regulation of [the second firm], for the Legal Services Board, published 16th of October 2025, para 133 |
| 7 | ‘The majority of reports from individual clients of [the firm] were closed without any investigation …’ | Independent review of the SRA’s regulation of [the second firm], for the Legal Services Board, published 16th of October 2025, para 134 |
| 7 | 67 cases; dishonesty found in 59 | Taking Their Word For It: The Evidence |
| 7 | Case study A: ‘The Firm did disclose this exact message …’ | SRA decision, 21st of July 2026, held by Blind Justice |
| 7 | Case study A: ‘did not have the bundle available to them …’; ‘our client accepted the firm’s position’ | Letter from the SRA’s solicitors, 30th of September 2026, held by Blind Justice |
| 7 | Case study A: ‘can only be considered once’ | Independent complaints reviewer to the solicitor, 2026, held by Blind Justice |
| 7 | Case study A: ‘was incorrect’; ‘was material to the original assessment …’; ‘a potential breach’; ‘not sufficiently serious’; ‘there is no right of appeal or review of this decision’ | SRA decision on reconsideration, 20th of October 2026, held by Blind Justice |
| 7 | ‘wrong in law’ | [2026] EWCA Civ 369 at [74]; see also [2025] EWHC 2341 (KB) |
| 7 | ‘Periods of professional experience in legal practice …’ | SRA, principles for qualified lawyers seeking admission, June 2024, footnote 4 |
| 7 | ‘your experience is pre-qualification (as this is automatically below the threshold level)’; five practice rights | SRA guidance on applying for an exemption from SQE2, updated 6th of August 2026 |
| 7 | Case study B: ‘the evidential threshold is higher …’ | SRA officer to the applicant, held by Blind Justice |
| 7 | Case study B: ‘does not appear to reflect the wording of the Principles’ | Legal Services Board to the applicant, 1st of October 2026, held by Blind Justice |
| 7 | ‘approximately 1,660 firms’; 431 sole owner-managers; motion kept off the agenda | SRA impact assessment as quoted in the Law Society Gazette, 14th of October 2026 |
| 7 | Practising fees up 17 per cent | Law Society Gazette, 3rd of September 2026 |

Case studies A and B are anonymised. The documents named are held by Blind Justice.

### Table 8. Sections 8 to 11

| Section | Quoted words or figure | Source |
|---|---|---|
| 8 | ‘You might say the profession has tried effectively to outsource its soul to its regulators.’; ‘displaced ethical decision-taking’; ‘cannot expect a regulator to translate the public interest into a set of rules.’ | Speech to legal regulators, London, as reported in Legal Futures, 29th of September 2026 |
| 8 | ‘I do not actually think that solicitors are any longer members of a profession …’ | Hansard, HL Deb 3rd of December 2012, Legal Profession: Regulation, vol 741 col 519 (Lord Phillips of Sudbury) |
| 8 | Costs warning; compulsory mediation | Administrative Reliability and Access to Justice (January 2026); Settle or Be Struck Out (June 2026) |

| Section | Quoted words or figure | Source |
|---|---|---|
| 8 | 72 per cent of matters closed without investigation | SRA, Investigations and enforcement annual report 2024/25 |
| 9 | Directions in 2025; 'disappointed by the standard of leadership and accountability …'; 'there is not sufficient evidence …'; additional performance targets | Legal Services Board, LSB intensifies action to improve SRA performance and protect consumers, 3rd of September 2026 |
| 9 | 'seek independent evidence' | SRA, performance targets to meet the conditions, 12th of March 2026, condition 3.5 |
| 9 | More than four in five reports never reach investigation | SRA, Investigations and enforcement annual report 2024/25 |
| 9 | 'a regulator may meet all procedural "tick-box" requirements …' | Independent Public Bodies Review of the Legal Services Board, Ministry of Justice, July 2026, page 27 |
| 9 | 'interesting and important' | SRA chief executive's office to Blind Justice, 2026, held by Blind Justice |
| 9 | 92 claims, £9.31 million | The Silenced Canary (May 2026) |
| 9 | Set to pay out £30 million | Legal Futures, August 2026 |
| 9 | Eight frontline regulators | Legal Futures, 16th of July 2026, reporting the Consumer Panel's position paper |
| 9 | 'The current regulatory framework is no longer fit for purpose'; 'structurally incapable of delivering the statutory objectives …' | Legal Services Consumer Panel, Position Paper: A Regulatory Framework for the Future, 16th of July 2026, as quoted in trade press reports of that date |
| 10 | Regulatory objectives | Legal Services Act 2007, section 1 |
| 10 | 'almost a case of defrauding the public …' | Hansard, HL Deb 4th of March 2015, Civil Proceedings and Family Proceedings Fees (Amendment) Order 2015, vol 760 col 319 (Lord Phillips of Sudbury) |
| 10 | Ten weeks | Post Office (Horizon System) Offences Act 2024: introduced 13th of March 2024, Royal Assent 24th of May 2024 |
| 10 | 'a conflict of interest between the two roles'; 'In a regulatory body the public interest should have primacy.' | Review of the Regulatory Framework for Legal Services in England and Wales, December 2004, chapter B, para 13, pages 28 to 29 |
| 10 | Separation of regulation from representation | Legal Services Act 2007, section 30 |
| 10 | 'we are not at the point where we are doing the regulatory process the best we can'; 'going back to the drawing board …' | Hansard, HL Deb 3rd of December 2012, Legal Profession: Regulation, vol 741 col 520 (Lord Phillips of Sudbury) |
| 10 | A single regulator at arm's length, reporting to Parliament | Independent Review of Legal Services Regulation, June 2020 |
| 10 | Scotland | Fit for the Future, October 2018; Regulation of Legal Services (Scotland) Act 2025 |
| 11 | 'You do not abuse your position by taking unfair advantage of clients or others.' | SRA Code of Conduct for Solicitors, para 1.2 |
| 11 | 'Where we close a file after assessment we don't record a reason electronically.' | SRA response to a public request, published on WhatDoTheyKnow, 24th of February 2017 |
| 11 | 'plausible, but not entirely convincing' | SRA case-study guidance on gathering evidence; Taking Their Word For It: The Evidence |
| 11 | Powers of the Legal Services Board | Legal Services Act 2007, sections 31, 32, 35, 37, 41 and 45 |
| 11 | 'through its delegated regulatory body the SRA' | Legal Services Board, directions under section 32, 29th of May 2025, as reported by Legal Futures on that date; statement of censure under section 35, 5th of March 2026, para 1 |

Quotations from documents not held in full by Blind Justice are taken from the published source named.