
3 September 2026

Richard Orpin
Chief Executive
Legal Services Board
2nd Floor, 2 Redman Place
London E20 1JQ

Dear Mr Orpin,

PM Law, early warning signals and preventing the next regulatory failure

Thank you for your email this afternoon. We will publish it alongside our open letter, in line with our commitment to publish every reply in full, and we look forward to the Board's considered response.

I write further to it, following today's announcement and the publication of the independent review into the Solicitors Regulation Authority's handling of PM Law.

On the 8th of May, Blind Justice UK submitted stakeholder evidence to the Board, relevant to its enforcement proceedings against the SRA and in particular to the section 55 information-gathering exercise: our research briefing *The Silenced Canary*, examining the visibility of consumer warning signs before the collapses of PM Law, SSB Law and Axiom Ince. You subsequently invited us to discuss those findings, and we met with you and your colleagues on the 30th of June.

Today's findings make that earlier work particularly relevant. The independent PM Law review has examined what happened inside the regulator: how information was held, connected, escalated and used in regulatory decision-making. Our research approached the problem from outside the regulator. It asked a complementary, forward-looking question:

Can warning signals visible in publicly available information be identified systematically before a regulated firm collapses?

Our research suggests that they can. In *The Silenced Canary*, we identified consumer warning signs concerning PM Law appearing well before its collapse, including reviews describing missed completions, unanswered communications and offices that had effectively stopped functioning. We also identified a net reduction of 35 reviews from PM Law's primary ReviewSolicitors profile over a 79-day period in late 2024. We made no claim about why those reviews disappeared; the finding was limited to the observable data.

The Governance Blind Spot, which I enclose, as the Board has not previously received it, considered the wider supervisory question: whether publicly available information and structural governance indicators could be used systematically to identify firms that may warrant closer regulatory attention. Its central concern was supervisory capacity, not prediction of individual firm failure. The significance of that work today is therefore not simply that warning signs can be identified retrospectively. It is whether they can help prevent the next failure. The confidential annex,



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containing the named-firm data underlying the published findings, is available to the Board on request.

When we met in June, I offered Blind Justice UK's assistance in taking this work further. In light of today's findings and the further enforcement action now being taken, I hope the Board will consider taking us up on that offer. We would be pleased to work constructively with the LSB to examine whether the indicators and methodology developed through our research could contribute to an additional early-warning approach across the regulated population.

There is also a clear connection with the open letter I sent you on Tuesday concerning *A Law Unto Themselves?*. If effective regulation depends upon intelligence being identified, connected and escalated, there is an accompanying assurance question about what happens when information entering the SRA is assessed and closed with no further action.

As that letter records, 8,317 matters received no further action at assessment and early resolution in 2023/24, and we have asked the Board to examine who, if anyone, checks the quality of those closure decisions. These are different parts of the same regulatory system: identifying warning signals, ensuring they reach the right decision-makers, and assuring the quality of decisions about whether information warrants further investigation.

The question now should not only be what went wrong at PM Law. It should be what can be done differently before the next PM Law emerges.

Blind Justice UK stands ready to assist the Board with that work.

Yours sincerely,

Edward Romain ACILEX

Founder & CEO