Blind Justice

Ward Hadaway LLP
7th Floor, 10 Chapel Walks
Manchester, M2 1HL
For the attention of [name withheld]
Your ref: [withheld]. SRA ref: [withheld]
By Email Only

Published copy. Identifying details withheld.

9th of November 2026

Dear Sirs

RE: PROPOSED CLAIM FOR JUDICIAL REVIEW: GROUND 4 AND THE RECONSIDERATION OF THE REPORT

We refer to your letter of the 22nd of October 2026 and to ours of the 5th of November 2026. The time for your client's response to our letter of the 5th of November remains 4pm on Thursday the 12th of November 2026, and nothing in this letter extends it. We write so that your client is in no doubt about the scope of the proposed claim if that time passes without the confirmations we have asked for.

1. Our letter before claim challenged two things. The first was the decision of the 15th of September 2026. The second, at paragraph 4, was your client's practice of deciding not to investigate a report on the untested account of the person reported, while maintaining no procedure by which the person who made the report can require that decision to be reviewed on its merits. Ground 4 is directed at that practice, and paragraph 18 explains that Blind Justice UK brings the claim as a charity challenging the practice and not only its own case.

2. Your letter answered grounds 1 to 3 by withdrawing both decisions. It did not respond to ground 4 at all. Nor did it answer paragraph 22 of our letter, which asked your client to explain how the absence of any effective means for a person who has made a report to seek reconsideration on the merits is consistent with the lawful operation of its assessment process. Withdrawing two decisions in one case does not answer a challenge to the practice under which they were made.

3. At paragraphs 25 and 30(e) of your letter, your client pointed to its complaints policy. Paragraph 30(e) describes the route by which the complaints team can refer a decision back where there is a material flaw or new information. On the 20th of October 2026, two days before your letter, your client's Corporate Complaints Officer closed Blind Justice UK's stage 2 complaint in this very matter under paragraph 31 of that policy, because pre-action correspondence had been sent, and directed that any further correspondence go through the legal process. Paragraph 25 describes a separate route, outside the complaints policy, by which a person may tell the team that a decision is wrong, after which 'the team will tell you if the decision can be reviewed'. That route depends entirely on your client's discretion. Blind Justice UK asked on the 10th of March 2026 whether the 1st Decision would be reconsidered, as paragraph 2 of your letter records. What followed was an enquiry of the solicitor alone and the 2nd Decision, which your client has now withdrawn and admitted was reached on

enquiries that were not detailed enough. Your client has not said who decides whether a decision will be reviewed under that route, on what criteria, whether it remains available after pre-action correspondence, or whether a person who has reported concerns has any entitlement to a reconsideration on the merits, as opposed to an opportunity to ask for one.

4. Where the complaints route is open, it does not reach the decision. On the 9th of November 2026, responding to a stage 1 complaint about a decision not to investigate in another matter ([reference withheld]), a Complaints Officer of your client wrote that any review by the Corporate Complaints Team 'will be a review of the service you have received from the SRA, and not a review of the decision made'. The decision in that matter ([reference withheld], dated the 13th of October 2026) states that there is no right of appeal or review for the person who reported the concerns.

5. At paragraph 30(h) of your letter, in answer to our request for any internal record, instruction, referral or correspondence concerning the 'established processes' its Head of Investigations described on the 30th of September 2026, your client stated that there are no documents to disclose.

6. The decision of the 13th of October 2026 in [reference withheld] closed a report about a solicitor and her former firm because there was no complaint, witness testimony or cooperation from the individuals involved. The decision maker considered whether to contact the solicitor and decided not to. On the 9th of November 2026, after your client's admissions of the 22nd of October, its Complaints Officer found that assessment reasonable. On the 8th of October 2025, closing an earlier report by the same person about the same firm, your client had written that it did not find it necessary to ask those individuals for witness statements. Your client decided not to seek potentially relevant evidence from those directly involved, including a solicitor it regulates, and then relied on its absence when closing the report. Its service review of the 9th of November did not reconsider the merits. Ground 4 challenges a practice which 'sanctions the closure of a report on the untested account of the person reported and treats further enquiry as unwarranted'. These decisions are further evidence of that approach, and of the absence of effective review, after your client's admissions of the 22nd of October. On the 9th of November 2026, the Legal Services Board wrote to Blind Justice UK that it recognises 'that the SRA's complaints handling, supervision and investigation require improvement to better meet the regulatory objectives under section 1 of the Legal Services Act 2007'. The same letter records that the LSB's Directions require your client to 'ensure more consistent assessment and triage of complaints/reports' and to 'make more effective use of its investigatory powers and independent evidence-gathering'. That is the stage of your client's process, and the failing, with which ground 4 is concerned.

7. In this matter, the fresh consideration your client agreed to on the 22nd of October was assigned to a case officer on the 6th of November. The case officer stated that they would begin work on the 16th of November. The officer's email summarises the concerns in the terms of our report of January 2026, as set out at paragraph 11 of your letter. It makes no reference to our four supplementary submissions of the 13th of April, the 14th of April (two submissions) and the 7th of September 2026, or to our further report of the 13th of August 2026, all of which your client holds. It does not mention the verification steps at paragraph 20

of our letter before claim, namely the SRA register, the court records for the appearances relied on and the claims on the firm's website. It promises an update by the 27th of November, not a decision.

8. If proceedings are issued, they will be brought on ground 4 against the practice, and on your client's failure to date to carry out the reconsideration it agreed to at paragraph 27 of your letter. Eighteen days after that agreement, work has not begun, no timetable to a decision has been given, there is no confirmation that the decision maker has had no prior involvement, and the scope announced omits most of the Report. In our letter of the 5th of November we warned against the course of letting time pass while describing the matter as under review. That is what has happened. A reconsideration that is announced six days before a deadline, assigned to an officer who is on leave until after it, confined to the scope your client has already admitted was too narrow, and directed to an update rather than a decision, is a reconsideration in name only. It is also being conducted at the very stage the Legal Services Board has directed your client to improve: the case officer is a Triage Lawyer who will apply the Assessment Threshold Test, and your client has shown nothing to suggest that the improvements the Directions require have been made. Blind Justice UK cannot be expected to treat as an adequate remedy a reconsideration conducted through a mechanism that the oversight regulator has found wanting and that has not been corrected. The reconsideration of one report is not, in any event, an alternative remedy for a challenge to the practice, and your client has identified no route by which a person who has reported concerns can obtain a reconsideration on the merits other than at its discretion.

9. In addition to the five confirmations in our letter of the 5th of November, we therefore ask your client to give us, by the same time:

   (a) written confirmation that the reconsideration will address the Report in its full scope, including the material listed at paragraph 7 above, and will include the verification steps at paragraph 20 of our letter before claim;

   (b) its response to ground 4 and to paragraph 22 of our letter before claim, which it has had since the 1st of October 2026; and

   (c) identification of the procedure for reviewing regulatory decisions described at paragraph 25 of your letter, including who determines whether a decision will be reconsidered, the criteria applied, whether the procedure remains available after pre-action correspondence, and whether a person who has reported concerns has any entitlement to a substantive reconsideration beyond your client's discretion to reopen a decision, or confirmation that no such entitlement exists.

10. When our letter before claim was sent, the firm's website made a public statement about the solicitor's higher rights of audience [wording withheld]. At paragraph 30(d) of your letter, your client confirmed that it had made no formal check of his higher rights qualification. Please confirm what, if anything, your client will do about that public statement pending its decision, and who is responsible for assessing the continuing risk in the case officer's absence. Members of the public deciding whether to instruct the solicitor are entitled to rely on that statement, and for as long as it remains unchecked, your client is leaving them to do so.

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11. Two further matters. First, the claimant is Blind Justice UK, as paragraph 1 of our letter before claim states, not Edward Romain personally, and your letter of the 22nd of October should be read accordingly. Second, on the 8th of October you said you would confirm whether you are instructed to accept service. Please confirm by the same time that you will accept service of the claim form by email under paragraph 4.1 of Practice Direction 6A, the email address to be used and any limitations applicable to electronic service under paragraph 4.2.

Blind Justice UK will place written representations on the full scope of the Report before your client's decision maker, including evidence bearing on the authorship of the website material that your client's earlier decision did not have. Those representations are not a substitute for anything asked for in this letter or in our letter of the 5th of November.

Yours faithfully

Edward Romain ACILEX
Founder and CEO, Blind Justice UK