

21 September 2026

Richard Orpin
Chief Executive
Legal Services Board
By email

Dear Mr Orpin

Open letter: closing a report on an account the regulator has not checked

Blind Justice UK publishes today No Further Questions, a study of Solicitors Regulation Authority decisions closing concerns reported about solicitors and firms. I enclose it. I am writing to ask the Board to act on what it shows, and I am publishing this letter alongside the report.

The Legal Services Board should require the SRA, using its statutory oversight powers where appropriate, to ensure that no report is closed at the assessment stage solely on the account of the person reported without a recorded reason why independent verification was unnecessary.

The SRA knows that solicitors can give it false information, because it prosecutes them for it. In one case before the Solicitors Disciplinary Tribunal a solicitor twice told the regulator in writing that he had stopped acting for clients. Both statements were false, and he admitted it. In another, a solicitor produced five letters he said he had sent to a client and a file memo he said a colleague had written, and told a recorded interview that he was adamant the letters were genuine. They had never been sent, and the colleague had never written the memo. An SRA forensic investigation officer found the inconsistencies herself. Both solicitors were struck off.

Those cases establish the point on which everything else turns. An account does not become reliable merely because a solicitor gave it. Whether it is true is a question, and it is a question the SRA is equipped to test.

We examined the closure decisions the charity holds, nine decisions covering twenty-six separate concerns. In every decision examined, at least one concern ended on an account from the regulated side, or on an innocent explanation the regulator supplied itself, without the decision recording any independent check of the claim that allowed scrutiny to stop.

Two of those decisions show the SRA obtaining independent material at the same stage and using it, and in one of the two the check disposed of a concern. The capacity to verify is not in doubt. What the decisions do not record is a reason why, in the other instances, verification was unnecessary.

The SRA's own internal review cannot answer this, and it says so. Its stage two complaint outcome of the 17th of September 2026 reads:



Blind Justice

'By its nature, my review was retrospective. I have looked at our activity and decisions, to check that they were based on an appropriate assessment of the information available to us. However, I have not undertaken new enquiries, and I cannot act to change or provide an alternative outcome for you.'

Where the information available was the regulated person's account, a review of whether that account was appropriately assessed is not a review of whether it was true. The gap is in the rule rather than in the diligence of any individual decision maker, which is why I bring it to the Board and not to the SRA.

The Board has acted in this area before. On the 29th of October 2024, following the independent review of the SRA's handling of Axiom Ince, it agreed to initiate the process to set directions under section 32 of the Legal Services Act 2007.

I ask the Board to do three things.

1. Require the SRA to ensure that no report is closed at the assessment stage solely on the account of the person reported without a recorded reason why independent verification was unnecessary.
2. Require the SRA to record, for every decision not to investigate, the proposition on which the matter was closed and the source of that proposition, and to publish the totals annually. At present nobody outside the SRA, and on the evidence of its own published data nobody inside it, can say how often a report ends on an untested account.
3. Ask the SRA to publish what evidential safeguard applies when a disputed factual proposition originates with the person reported and that proposition is capable of ending the concern. If there is no requirement for independent verification, it should say so expressly, and explain how the risk demonstrated by its own disciplinary cases is controlled.

I should be clear about what this letter does not say. Nothing in our work shows that any account accepted in those decisions was untrue, and we make no allegation against any solicitor or firm. The finding is about what the decisions record, and it is scoped to the decisions we hold. Nine decisions are not a measure of how the SRA disposes of reports generally.

The nine decisions will be made available to the Board in confidence and in redacted form, with the agreement of the people who made the reports, and I would welcome a meeting with you or the appropriate regulatory oversight team. I would be grateful for a substantive response by the 19th of October 2026, and any response the Board wishes to be published will be reproduced in full alongside this letter and the report.

Yours sincerely

Edward Romain ACILEX
Founder & CEO



Blind Justice

PUBLIC REPORT

NO FURTHER QUESTIONS

A Blind Justice follow-up to Taking Their Word For It

The SRA's own disciplinary cases show that solicitors can mislead the regulator. Blind Justice examined a selection of closure decisions and found that, in every decision examined, at least one concern ended on a claim that was not independently checked.

Blind Justice UK

Registered Charity No. 1217562

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Lead researcher: Edward Romain, ACILEX

Founder and CEO, Blind Justice UK

**The SRA prosecutes solicitors for misleading it.
Its closure decisions can end on a claim it did not check.**

WHAT THIS REPORT SHOWS

The Solicitors Regulation Authority prosecutes solicitors who give it false information, and its own forensic investigators have exposed documents that were not genuine. Blind Justice examined a selection of SRA decisions closing concerns about solicitors and firms. In every decision examined, at least one concern ended on an account from the regulated side, or on an innocent explanation the regulator supplied itself, without the decision recording any independent check of the claim that allowed scrutiny to stop. Two of them show the SRA obtaining independent material at the same stage and using it, so the capacity to verify is not in doubt, and in one of those two the check resolved a concern. Nothing in this report says any of these accounts were false. The full corpus comprises nine decisions covering twenty-six separate concerns. The methodology and limitations are set out in section 9.

The Solicitors Regulation Authority knows that solicitors can lie to it. It prosecutes them for it.

One solicitor told the regulator, in writing, that he had stopped acting for clients. Asked again three months later, he said it a second time. Both statements were false and he admitted it.

Another gave the regulator five letters he said he had sent to a client, and a file memo he said a colleague had written. Asked in a recorded interview whether one of the letters was genuine, he answered: 'I am adamant that it is.' The letters had never been sent. The colleague had never written the memo. An SRA forensic investigation officer read the documents and found the inconsistencies herself.

Both were struck off.

Those cases establish something the rest of this report depends on. A solicitor's account does not become reliable merely because a solicitor gave it. Whether it is true is a question, and it is a question the SRA is equipped to test.

Blind Justice examined a selection of SRA decisions closing concerns reported about solicitors and firms.

In every decision examined, at least one concern ended on an account from the regulated side, or on an innocent explanation the regulator supplied itself, without the decision recording any independent check of the claim that allowed scrutiny to stop.

Two of them show the SRA obtaining independent material at that same stage and using it. In one, it tested a firm's explanation against the terms of two court orders. The capacity to verify is not in doubt, and this report does not suggest otherwise. In one of the two, that check resolved one of the concerns in the letter. In each decision examined, a further concern ended on a proposition the decision does not record being checked at all.

Nothing here says those accounts were false. What the decisions do not record is an independent check establishing that the decisive proposition was true.

Its own prosecutions show why nobody should have to assume it.

1. Two solicitors who told the SRA something untrue

The first was a sole practitioner. His practising certificate was suspended on the 20th of September 2019. A client he had been acting for complained to the SRA in March 2020, after he stopped answering her emails. A second report followed from a man on the other side of a debt claim he was pursuing, who, in the Tribunal's words, 'having discovered that the Respondent was not a practising solicitor as evidenced by the Law Society website, reported him to the SRA'.

During the investigation the SRA asked him whether he had continued to act.

'I will however confirm that after the intervention, I have NOT continued to act for any clients including Client A1.'

Email to the SRA, 16 November 2020

'I wish to confirm that since my suspension as a solicitor I have not undertaken any legal work that would cause me to be in breach of the suspension nor have I corresponded with any clients.'

Email to the SRA, 3 February 2021

Both statements were false and he knew it. That became a disciplinary allegation in its own right, which he admitted. The material that established it was the correspondence the two people who reported him had kept, and which the Tribunal's statement of agreed facts reproduces. He was struck off on the 20th of July 2023.

The second was a partner at his own firm. An SRA forensic investigation began in June 2021 after reports from another firm acting for the executors of an estate. Asked for the client file in a trust matter, he supplied five letters he said he had sent to the client, and a memo he said a colleague had written. In a recorded interview the officer asked him directly whether a letter of the 20th of March 2013 was genuine.

‘I am adamant that it is.’

Recorded interview with the Forensic Investigation Officer, 16 September 2021

He confirmed that he had given the officer nothing intended to mislead her. The officer examined the letters and ‘identified various inconsistencies, contradictions and omissions in three of them’. The colleague named as the memo’s author said he had no recollection of writing it. A second former colleague said the same. The client’s son said his father had never received the letters. The Tribunal found the documents were not genuine and that providing them was dishonest. It heard the case on the 17th of February 2025 and struck him off, in a judgment dated the 3rd of March 2025.

The two cases point in the same direction from opposite sides. The first set of denials was exposed because the people who reported him had kept their documents. The second was exposed because an SRA officer read the documents and checked them against other sources.

Checking works. That is not a criticism of the SRA. It is the strongest thing that can be said for it.

2. The question

If the SRA knows, from its own prosecutions, that a solicitor’s account to the regulator can be false, when must it check one before allowing that account to close a report?

In the published assessment material reviewed for this report, Blind Justice found no requirement that the decisive account be independently verified before closure. The SRA’s guidance Making decisions to investigate concerns, first published on the 8th of August 2016 and updated on the 30th of December 2021, sets out a three-stage Assessment Threshold Test: whether there has been a potential breach, whether it is sufficiently serious, and whether it is capable of proof. On the third stage the guidance says the SRA takes into account ‘the evidence given to us and that capable of being gathered in support’, and that it bears in mind what it could realistically obtain ‘from the complainant, the firm or individual complained about, or from any third party’. Obtaining material from a third party is contemplated. Nothing in the guidance requires it before an account from the person reported is allowed to close a concern.

That is a statement about the published material. Blind Justice cannot see the SRA’s internal procedures, and if an internal requirement exists the SRA can say so, which is one of the things this report asks it to do.

The decisions that follow show what that looks like in practice.

3. Four closures

The same envelope

On the 3rd of July 2026 a man who had spent years in dispute over his pension entitlement reported a firm and one of its solicitors to the SRA. The firm had acted for the other side. His bundle contained his complaint, the firm’s response to him, and his reply to that response.

THE FIRM

‘We are required under data protection legislation to ensure that personal data is not retained for longer than necessary. As the applicable retention period had expired, the file was destroyed in accordance with our data retention policy.’

THE REPORTER, IN THE SAME BUNDLE

‘A document retention policy does not of itself answer whether it was appropriate to destroy a file that related to a long-running dispute concerning statutory pension rights.’

He asked the firm to state the date on which the file was destroyed, the retention policy applicable to that file, whether it had previously been archived, and whether any advice memoranda, draft opinions or instructions to counsel survived outside the principal file. He asked it to 'provide details of destructions certificates'.

THE SRA

'The Firm was entitled to destroy its file in line with its file destruction policy. No regulatory issue arises from it doing so.'

Decision not to investigate, 28 July 2026

The decision records no obtaining of the policy, destruction certificates, destruction date or surviving material. It sets out what the officer did consider: the documents provided by the reporter, the SRA's internal records, and its decision-making guidance. It records no approach to the firm.

The question is not whether the firm's statement was false. The decision does not record an independent check establishing that it was true. The question is how one party's assertion became the regulator's finding, in a letter answering a report that had asked for the document which would settle it.

The same document, the same decision

A woman reported a firm to the SRA over its conduct of her son's criminal case. Among her concerns was that a non-authorised member of staff had carried out reserved legal activities without supervision by a solicitor. The decision of the 18th of June 2026 records:

'The SRA have been provided with a copy of the firm's client care letter, dated 17 December 2024. It is noted that this is not the original letter, as it appears to have been amended at a later date. However, its contents confirm that the case was being handled by solicitor, [name redacted].'

Decision not to investigate, 18 June 2026

One word separates the two halves of that passage: 'However'.

The letter was supplied by the firm. What it actually says, as the decision goes on to quote, is that the client's first point of contact should be a named Senior Crown Court Clerk. The decision acknowledges that she is not a solicitor, and concludes: 'it appears that the case was being overseen by [name redacted].'

Supervision is not stated in the document. It is inferred from it. The document is one the same paragraph records as not original and apparently altered, and the report was that the case had been run without supervision.

The disputed fact, denied by the party accused of it

A report to the SRA in 2025 raised eight concerns about a firm acting against the reporter. The sixth was that the firm had submitted to the court an order containing fabricated judicial content. The decision of the 26th of June 2025 records the firm's answer, and then closes the concern.

'The firm confirms that no inaccurate Court Order was ever submitted.'

'Given the firm's explanation, and that the position was made clear both in the email to the Court and subsequent email to [the reporter], we do not find that there has been a breach of our Standards and Regulations.'

Decision not to investigate, 26 June 2025

The decision records no obtaining of the court file, the email to the court of the 21st of May 2025, or the order itself.

The disputed fact was whether an inaccurate order had been submitted. The evidence recorded for resolving that dispute was the denial of the party said to have submitted it.

Asked what it had verified, the SRA asked him again

In March 2026 the SRA closed a report about whether a solicitor had held himself out as a solicitor before admission. Nobody had asked him anything. The decision records that the officer reviewed the information provided by the reporter and the SRA's own records. The explanations in it are the regulator's own.

'We consider it likely this was an inadvertent oversight by the individual responsible for this website at the time, rather than as a result of [the solicitor]'s direct actions.'

'it is likely he supported on the matters referenced in his capacity as a trainee solicitor, under the supervision of a solicitor. In the alternative, the Court may have granted him a right of audience.'

'In the absence of clear evidence that [the solicitor] acted as, or pretended to be, a solicitor prior to admission, we are satisfied no further investigation is necessary. If [the reporter] can provide clear evidence that [the solicitor] acted as a solicitor prior to his admission, we invite him to provide this for further consideration.'

Decision not to investigate, 10 March 2026

The charity complained. The officer's letter of the 15th of September 2026 records the complaint in terms.

'you noted our decision not to investigate appeared to rely on a number of explanations for the matters reported but did not identify what verification steps were undertaken before those explanations were accepted. I advised you that I would make enquiries of [the solicitor] in respect of the concerns you had identified.'

He did. Eight paragraphs of the solicitor's account follow, including that he 'does not recall who drafted the wording' on the website in question, and that at worst it is 'clumsy wording'. The letter closes:

'Given the explanation provided by [the solicitor], we are satisfied that no further investigation is required on this occasion.'

Letter to the reporter, 15 September 2026

A complaint that explanations had been accepted without verification was answered by obtaining another explanation from the person reported, and closing on that.

4. The SRA can check. Twice in this corpus it did

This is not a report about a regulator that never looks.

In a decision of the 24th of March 2022, a firm explained why money had passed through its client account. The SRA tested that explanation against the terms of two court orders, which it quotes and relies on, and concluded that the money had been received and released in accordance with them. That is verification against an independent record, at the assessment stage, in exactly the way the rest of this report says is absent.

In a decision of the 25th of September 2025, the officer records contacting the firm for comments, comparing its account with the correspondence the reporter had supplied, and reviewing the firm's own policy for vulnerable clients.

And the forensic case above shows that process doing what it exists to do.

So neither the capacity nor the willingness is in question. In the 2022 decision the check did dispose of that concern. What neither decision shows is that capacity applied to every claim capable of ending a concern. The same 2022 letter resolves a separate question, about what a third party knew, on emails supplied by the firm, with no approach to that third party recorded. In the 2025 decision, the concern closes on the firm's acknowledgement of shortcomings and its indication that further training would be provided, from which the decision reaches a finding about present risk: 'we are satisfied that there is no outstanding risk to the wider public'.

A statement about what a firm will do in future became a finding about what the public faces now.

5. How the false accounts came to light

Three further disciplinary cases show how heavily detection can depend on information arriving from outside the regulator.

The confirmation that stood for seven weeks

On the 21st of October 2021 the SRA wrote asking for confirmation that no work was being conducted after his firm's insurance had lapsed. On the 5th of November he replied: 'Confirmed.' That answer stood until the 21st of December 2021, when the solicitors acting for the purchaser of a property, where that firm acted for the seller, contacted the SRA to query its status. In a call the same day he said it was a one-off. He had acted on at least three matters and had completed on another client's sale five days earlier.

'the information given to the SRA was misleading as [the solicitor] was continuing to work on a number of cases despite telling the SRA that he was not.'

Solicitors Disciplinary Tribunal, 12499-2023, at 24.6

In fairness, the SRA was not idle in those seven weeks. It closed his application to authorise a new firm on the 24th of November for want of information. What it did not do in that period was test the confirmation, and the thing that eventually tested it was a telephone call from a solicitor on the other side of a conveyance.

The explanation that was accepted

She reported her own conviction to the SRA on the day she was convicted, and that should be said plainly. The false account she later gave concerned something narrower: the reason she had been slow to answer the regulator's requests. On the 7th of April 2024 she told the investigator handling her practising certificate that her father had suffered a serious heart attack and she had been away caring for him. Her employer's own chronology showed the heart attack had been notified in early February, the discharge days later, and that she had been in the office on the days in question. The explanation was accepted. Her practising certificate was granted free of conditions on the 17th of April.

It came to light only because she then sent her employer copies of the correspondence which she had altered, and her employer had questions about the reason given in the email of the 7th of April. The conduct investigation into the convictions themselves went ahead regardless. This is not a case where a false account ended scrutiny. It is a case where a false account was accepted, and the person who noticed was not the regulator.

The account the regulator did check

In January 2023 the SRA wrote to him about a referral from a district judge. His representative answered in February. The SRA received the firm's client file the same day and reviewed it. On the 11th of October 2023 it received a separate report from the firm acting for the defendant in the underlying litigation, made, as the judgment records, 'in line with the court order dated 24 November 2022, which directed that a copy of the judgment was to be sent to the SRA'. That firm went further than the order required and reported that the claimant was an employee of that firm, exhibiting three claim notification forms.

The Tribunal dismissed the allegation about the February answer, finding it accurate in context because the SRA's questions had concerned a company rather than the individual. The dishonesty finding concerns what he said in November 2023, after the outside report had arrived, and his successive explanations through to July 2024. He was struck off in July 2026.

That case matters here for a narrower reason than it first appears, and the narrow reason is the honest one. The SRA checked. It obtained the client file on the same day it received the answer, and that file contained the emails which eventually proved decisive. What moved the matter was a report from an opposing firm, made because a judge had ordered it.

Across the five judgments examined, the pattern is consistent. In each, what opened the matter or exposed the account came from outside the regulator: a client, the debtor she was pursuing, an employer, an opposing firm

twice over, a judge. In two of the five, the regulator's own examination of documents produced or confirmed the contradiction. In three, it came from outside entirely.

The people whose material is recorded at the assessment stage as a concern or an allegation are, in the disciplinary record, among the people whose material exposes false accounts.

6. What the person who reported can do about it

Very little, on the documents examined here.

Every one of the decisions in this corpus 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.' One puts it more bluntly: 'There is no way to appeal or apply for a review of our decisions.'

That is accurate. A decision not to investigate does not appear in the annex of decisions the SRA has made formally reviewable, so neither side can apply. What follows from it is not symmetry. Every decision in that annex is one that goes against the person entitled to apply. A decision not to investigate imposes no adverse regulatory outcome on the solicitor.

The service complaints route is not a substitute, and the SRA says so itself.

'By its nature, my review was retrospective. I have looked at our activity and decisions, to check that they were based on an appropriate assessment of the information available to us. However, I have not undertaken new enquiries, and I cannot act to change or provide an alternative outcome for you.'

Stage two complaint outcome, 17 September 2026

The test that reviewer applied was whether the decision was an appropriate assessment of the information available. Where the information available was the regulated person's account, that is a review of how well the account was assessed, not of whether it was true.

One qualification, and it cuts against the simplest version of this argument. A challenge can produce a fresh enquiry. In the fourth closure described in section 3 it did. What the person who reported could not do was determine the direction of that enquiry, and the step taken was to ask the person reported for another explanation.

7. What this report does not say

Nothing in the disciplinary cases shows that any account accepted in the closure decisions examined was untrue, and this report does not suggest it.

It makes no allegation against any solicitor or firm in those decisions. Every one of them may have been telling the SRA the plain truth.

The finding is about what the decisions record, not about whether anyone did anything wrong.

And it is scoped to the decisions examined. Nine decisions are not a measure of how the SRA disposes of reports generally, and no figure in this report should be read as one.

8. What must happen

A rule about the source of the decisive proposition

The Legal Services Board should require the SRA, using its statutory oversight powers where appropriate, to ensure that no report is closed at the assessment stage solely on the account of the person reported without a recorded reason why independent verification was unnecessary. The Board has used those powers before: on the 29th of October 2024, following the independent review of the SRA's handling of Axiom Ince, it agreed to initiate the process to set directions under section 32 of the Legal Services Act 2007.

A record that can be counted

The SRA should record, for every decision not to investigate, the proposition on which the matter was closed and the source of that proposition, and publish the totals annually. At present nobody outside the SRA, and on the evidence of its own published data nobody inside it, can say how often a report ends on an untested account.

A question asked in public

The Justice Committee should ask the SRA what its policy is on verifying an account from a regulated person before that account is allowed to close a report, and whether it holds any data on how often this occurs.

And the question this research has earned the right to ask

The SRA should publish what evidential safeguard applies when a disputed factual proposition originates with the person reported and that proposition is capable of ending the concern. If there is no requirement for independent verification, it should say so expressly, and explain how the risk demonstrated by its own disciplinary cases is controlled.

The issue is not whether solicitors sometimes tell the truth. Of course they do. Nor is it whether every factual proposition requires a forensic investigation. It does not. The issue is whether a regulator that prosecutes solicitors for misleading it should allow a disputed account from the person reported to become the decisive reason for ending scrutiny without recording why no independent check was necessary. In every closure decision examined here, at least one concern did exactly that.

9. Evidence, method and interests

Every quotation in this report is taken from a document opened and read in full for this report. The nine closure decisions and three complaint outcomes are held in full. The five disciplinary judgments are public.

The corpus

Nine SRA decisions closing concerns, dated between March 2022 and September 2026, covering twenty-six separate concerns, reported by six people or organisations. Each concern was coded once, by the proposition that disposed of it. Eight were disposed of on jurisdiction or forum, being matters for the Legal Ombudsman, the Information Commissioner or the court. Four were disposed of on the regulator's assessment of material supplied by the person who reported. Twelve ended on an account from the regulated side. One ended on an explanation the regulator supplied on the regulated person's behalf. One was resolved by applying a rule to facts that were not in dispute. Two decisions record an independent check of what the SRA had been told. In one of those two the check disposed of one of the two concerns in the decision, and the other concern in the same letter ended on emails supplied by the firm about what a third party knew, with no approach to that third party recorded. In the other, the checking was not applied to the proposition on which any concern ended.

Published SRA material relied on

SRA, Making decisions to investigate concerns, guidance, first published 8 August 2016, updated 30 December 2021, including the three-stage Assessment Threshold Test and the passages quoted in section 2 under the heading 'Is that breach capable of proof?'. SRA Application, Notice, Review and Appeal Rules, rules 3.1 to 3.3 and annex 1. SRA Regulatory and Disciplinary Procedure Rules, rule 1.1, under which each of the nine decisions was made.

The judgments

Five judgments of the Solicitors Disciplinary Tribunal, each read in full, and cited by case number rather than by name: 12457-2023, 12499-2023, 12658-2024, 12873-2025 and 12822-2025. All five are published and can be checked by anyone. A sixth case was considered and excluded because the document establishing the relevant chronology is annexed to a judgment we do not hold.

How the corpus was assembled, and its limits

It is not a sample. The decisions examined are those the charity holds. A corpus assembled in that way cannot support any claim about how often anything happens, and no such claim is made.

Consent

Every private decision letter quoted here is quoted with the agreement of the person who reported the matter. Where a quotation contains identifying information, square brackets mark a redaction or a neutral descriptor. No meaning has been changed.

Availability

The nine decisions will be shared in confidence and in redacted form, with the agreement of the people who made the reports, with journalists, the Legal Services Board and any parliamentary committee that asks. Requests to info@blindjustice.org.uk.