



Blind Justice

EVIDENCE FILE TO THE PUBLIC REPORT

TAKING THEIR WORD FOR IT THE EVIDENCE

The sources, the five decision letters coded concern by concern, the 833-case Tribunal corpus and the coding of the SRA's own published examples, published with the report Taking Their Word For It: The regulator that asks the solicitor.

Blind Justice UK

Registered Charity No. 1217562

September 2026

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Summary

When a member of the public reports a solicitor to the Solicitors Regulation Authority, the report goes first to an assessment stage. Most reports end there. In 2023/24 the SRA's assessment team dealt with 11,421 concerns. It closed 8,317 of them with no further action, 72.8 per cent, and referred 1,763 for investigation, 15.4 per cent. A Law Unto Themselves, published by Blind Justice on the 1st of September 2026, established that a decision not to investigate cannot be reviewed on its merits by anyone. This briefing asks the question in between: what does the assessment stage actually do before it closes a report?

The evidence examined here shows a recurring method: the SRA asks the solicitor and accepts the answer without independently verifying it. For four years the SRA told the profession that assessment was a process which 'allows us to obtain, gather and verify information'; that sentence appears in its annual reports for 2019/20 to 2022/23, each of which credits the process with the fall in referrals, and it is absent from the report for 2023/24. The SRA's public case studies describe the first half of the method: 'we will ask the solicitor to provide us with information ... If a solicitor shows that they thought about the issue, made any appropriate enquiries and reached a rational decision, we are unlikely to investigate.' Its page for reporters, updated on the 11th of September 2026, says it may not investigate where it 'wouldn't be able to contradict a likely reasonable explanation by the firm or solicitor'. Its own Board was told in July 2024 that a closure letter had 'repeated the solicitor's explanation ... without being clear it was the solicitor's explanation'. The Independent Reviewer recommended in 2022 that closure letters say whether the information relied on 'had come from the individual concerned or from a representative of his/her firm'. The firms that defend solicitors describe the same process from the other side: a report closed 'within four days' of the solicitor's representations; the SRA 'may take no action having been satisfied with the explanations it has received'.

Three independent reviews have found the method at work in three major firm collapses of recent years. The Axiom Ince review found the SRA 'placed its trust in law firms' to supply the bank evidence it should have obtained itself. The SSB review found the SRA 'placed the onus on complainants to provide it with evidence' and took the firm's account of its own solvency 'at face value'. The PM Law review, published on the 3rd of September 2026, found reports closed on 'the SRA taking the PM Law Group's explanations at face value and opting not to investigate further', and a forensic investigation 'closed on the basis of explanations from the PM Law Group's CEO that were not independently verified'. The Legal Services Board censured the SRA on the 5th of March 2026 for 'over-reliance on information provided by SSB itself, rather than independent verification'.

The courts and the Solicitors Disciplinary Tribunal show what the method costs. An SRA decision not to investigate, issued fourteen days after a firm's self-report and adopting the firm's own account, was quoted verbatim by the High Court and held 'clearly wrong', and by the Court of Appeal and held 'wrong in law'; the error was one of law, on section 21(3) of the Legal Services Act, and the courts made no finding that the firm's account of supervision was untrue. Blind Justice screened every published Solicitors Disciplinary Tribunal judgment from 2015, 833 cases in all, read in full the 271 that matched its search terms, and found 67 in which a solicitor was proved or admitted to have given the SRA false or misleading information during an enquiry. In 43 of the 67 the falsehood was exposed by an SRA officer's own checking of documents, most of them, 32, in forensic investigations, where checking is required. Of the eleven statements made at the assessment stage, eight were exposed by someone outside the SRA. Where the SRA checks, it catches false explanations. At the stage where it does not check, it almost never does.

Blind Justice holds five assessment-stage decision letters issued by three different investigation officers, two dated 2025 and three dated 2026, across three underlying matters. They contain fourteen concern-level decisions, including one reconsideration of the same concern after challenge. Every one was coded on the same questions. In none of the five does the officer record a step taken to test what the regulated person said against any source outside that person's own account. In one, the officer records that the document he relies on 'is not the original letter, as it appears to have been amended at a later date', and relies on it in the next sentence. In another, a report is closed on the officer's own conjecture about what

'likely' happened, reopened when the absence of verification is expressly challenged, and closed again some months later on the regulated person's explanation, with no check described. Asked what was verified, the SRA has since confirmed in writing: 'we did not seek further evidence'.

How often this happens cannot be counted, and the reason is itself a finding. The SRA told a requester in 2017 that 'Where we close a file after assessment we don't record a reason electronically', told another in 2019 that 'overturned' is not a recorded decision type, and told a third on the 1st of July 2026 that statistics on why reports are closed would need 'manual review of individual case files'. The regulator that has been censured for taking firms at their word cannot say, from the data it records, how often it does so.

None of this is an allegation against any solicitor. The letters may well be right about the people they concern. The finding is about the method, and the method is the one the SRA's own guidance, its own Board, its oversight regulator and the courts have each, in their own words, described. The five decisions are described here with identifying detail removed. Blind Justice holds them in full and will share them, in confidence and with the agreement of the people who made the reports, with journalists and with the Legal Services Board so that the reading offered here can be checked against the documents themselves.

Key findings

1. The SRA described assessment as verification for four years, then stopped. Its annual reports for 2019/20, 2020/21, 2021/22 and 2022/23 each say the assessment process 'allows us to obtain, gather and verify information', and each credits it with the fall in referrals, 'almost a 37% decrease' in the first year. The 2023/24 report, published in February 2026, drops the sentence. Its case studies for the public say 'we will ask the solicitor to provide us with information' and that if the solicitor 'shows' a rational process 'we are unlikely to investigate'. Its reporting page says it may decline to investigate where it 'wouldn't be able to contradict a likely reasonable explanation by the firm or solicitor'. Its case-study guidance on gathering evidence, by contrast, treats a 'plausible, but not entirely convincing' explanation as the reason to check it with the reporter.

2. The SRA has admitted repeating a solicitor's explanation as its own finding. Its Board paper of the 9th of July 2024 records an upheld complaint: 'we repeated the solicitor's explanation in the closure letter without being clear it was the solicitor's explanation. Feedback was provided for learning.' Two years earlier the Independent Reviewer had recommended that closure letters make clear whether information 'had come from the individual concerned or from a representative of his/her firm'.

3. The regulated side describes the same method from its own desk. A defence firm's note of the 4th of August 2026 records that 'within four days of receiving those representations, the SRA decided not to investigate the matter further'. Another tells clients the SRA 'may take no action having been satisfied with the explanations it has received'. A third describes assessment as 'early engagement with either or both of the person who made the report and the person/firm who is the subject'. The SRA confirmed in May 2026 that assessment is partly outsourced to three panel firms providing around fifty staff.

4. An assessment closure whose legal reasoning the Court of Appeal held wrong in law. The SRA's letter of the 2nd of December 2024, issued fourteen days after a firm's self-report, said it was 'satisfied' the employee 'has not conducted a reserved legal activity without entitlement' and that 'since this decision, Mr Ashall has always supervised Mr Middleton's work'. The High Court called the reasoning 'clearly wrong'; the Court of Appeal called the letter 'wrong in law'; the SRA itself later reversed its position. The letter gives no source for its statement about supervision other than the firm. The Court of Appeal allowed CILEX's appeal on the wider question and recorded the supervising solicitor's evidence that he did supervise; the error the courts identified was in the law, not in the facts the firm reported.

5. When the SRA checks, it catches false explanations. At assessment, independent checking is not expressly required by the SRA's published targets, and none is recorded in the five decisions examined. Every published Solicitors Disciplinary Tribunal judgment from 2015 to September 2026 was screened, 833 cases, and the 271 matching the search terms were read in full: 67 of them with a proved or admitted

finding that the solicitor gave the SRA false or misleading information during an enquiry, dishonesty found in 59. In 43 of the 67 the falsehood was exposed by an SRA officer's own cross-checking of documents; in 21 it came from a complainant, an opponent, an employer, a public record or another regulator; two were admitted, one is not stated. Forty of the statements were made in forensic investigations alone, and thirty of those were caught by the forensic officer. Eleven were made at assessment or early enquiry, and eight of those came to light from outside the SRA. The dataset is published with this briefing.

6. Three independent reviews found the method in three major firm collapses. Axiom Ince (2024):

'Documentary evidence provided by the firm supported this explanation. This was accepted and the matter was therefore closed.' SSB (2025): 'the SRA accepted this at face value' and 'placed the onus on complainants to provide it with evidence'. PM Law (2026): 'FIO1 accepted at face value information provided by PM Law Limited and did not independently verify it.' The officer in PM Law told the reviewers why: 'it seemed unlikely that they would be telling you something that everyone knows is wrong'.

7. No independent verification is recorded in any of the five decisions Blind Justice holds. Across fourteen concerns closed by three officers, no letter records a check of the regulated person's account against a court file, a third party, a public register or an independent document. Seven concerns close on the words of the person reported: 'the firm has confirmed', 'states that he has not', 'given the explanation provided'. One closes on the officer's own supposition. One relies on a document the officer records as 'amended at a later date'. One is closed again, after an express challenge on verification, on the solicitor's reply, and the SRA has since confirmed of that closure that 'we did not seek further evidence' and that it considered the solicitor's response sufficient.

8. The burden is placed on the reporter, months after the LSB was told this must stop. Three of the five decisions return the burden to the person who reported: 'if [the reporter] can provide clear evidence ... we invite [the reporter] to provide this'; 'not capable of proof'. The SSB review's first recommendation on assessment was that the onus be moved from the complainant to the regulator. The SRA said it accepted it.

9. The performance targets require independent evidence in investigations and nothing equivalent at assessment. Condition 3.5 of the SRA's targets, published on the 12th of March 2026, requires that investigations 'seek independent evidence' and, for higher-risk firms, that this is 'not solely firm-provided material'. Condition 3.3, which covers assessment, measures '90%+ agreement between reviewing officer and case officer in the application of the ATT across sampled cases'. Two officers agreeing to accept an explanation is a pass.

10. The SRA does not record why it closes reports, so nobody can count this. In 2017: 'Where we close a file after assessment we don't record a reason electronically.' In 2019: 'overturned' is not a recorded decision type. On the 1st of July 2026: closure statistics by theme would require 'manual review of individual case files'. The published series gives closures by category, never by reason. The one thing the SRA does count is complaints about its closures: 564 in 2023/24, which is 86.7 per cent of complaints about its investigation work on the SRA's own figure, and 52.8 per cent of the 1,069 Stage 1 and Stage 2 service complaints it responded to that year.

11. Assessment is faster, and fewer reports are investigated. Reports rose from an average of 1,024 a month in 2023/24 to 1,375 in 2024/25 and a record 2,197 in October 2025. Lawyers were redeployed to 'a second triage stage to identify lower risk matters that can be dealt with more quickly'. Average assessment time fell from 60 days to 42. The proportion of reports investigated fell from 37 per cent of matters in 2018/19 to 18 per cent in 2024/25 and '15% in 2025/26'.

12. The oversight regulator has said reform is not yet showing in outcomes. On the 3rd of September 2026 the LSB kept its Directions and targets in place and announced further action, finding 'not sufficient evidence to demonstrate that the changes introduced by the SRA are consistently delivering improved outcomes for the public and consumers'. The three 2026 letters in this briefing are what that looks like at the desk where reports are closed.

Chronology

Date	Event	Source
24 Feb 2017	SRA to a requester: 'Where we close a file after assessment we don't record a reason electronically.'	WhatDoTheyKnow disclosure
22 Jul 2021	SRA annual report: the assessment process 'allows us to obtain, gather and verify information'; 'almost a 37% decrease' in referrals credited to it. Repeated in the reports for 2020/21 and 2021/22, and in shortened form in 2022/23.	Upholding Professional Standards 2019/20
Oct 2022	Independent Reviewer recommends closure letters say whether information 'had come from the individual concerned or from a representative of his/her firm'.	Independent Reviewer report 2022
12 Sep 2023	SRA Board action plan: 'There have been issues with the quality of decision making in our enforcement casework'; 'updated threshold test' due November 2023.	SRA Board action plan
23 May 2024	SRA publishes case studies: 'we will ask the solicitor to provide us with information ... we are unlikely to investigate'.	sra.org.uk
9 Jul 2024	SRA Board told a closure letter 'repeated the solicitor's explanation ... without being clear it was the solicitor's explanation'.	SRA Board paper, para 27
Oct 2024	SRA introduces a templated decision document requiring officers to set out 'the steps we have taken to investigate'.	SRA Board paper, 30 June 2025, para 19
29 Oct 2024	LSB publishes the Axiom Ince review: SRA 'placed its trust in law firms'; firm's explanation 'accepted and the matter was therefore closed'.	Carson McDowell review
2 Dec 2024	SRA declines to investigate a firm's self-report fourteen days after receiving it; letter later held 'clearly wrong' and 'wrong in law'.	Mazur [2025] EWHC 2341; [2026] EWCA Civ 369
21 Feb 2025	SRA reopens a matter it had closed after 'contact' with the subject 'based on all the evidence we had at the time'.	SRA statement, Legal Futures
2025	Decisions A and B issued. Eleven concerns; closed on the firm's confirmation, deferral to the court, and 'not capable of proof'.	Letters held by Blind Justice
30 Jun 2025	SRA Board told that 564 of 650 complaints about investigation work (86.7%) concern decisions not to investigate.	SRA Board paper, para 11
16 Oct 2025	LSB publishes the SSB review and announces its intention to censure. SRA 'placed the onus on complainants'; took the firm 'at face value'. SRA Chair: 'We fully accept the recommendations'.	Carson McDowell for the LSB; LSB and SRA releases
Oct 2025	Record 2,197 reports received in a month. Lawyers redeployed to a second triage stage.	SRA Board performance reports, Jan and Apr 2026
2 Feb 2026	SRA annual report for 2023/24 published without the 'obtain, gather and verify' sentence. Assessment described in one line.	Investigations and enforcement annual report 2023/24
5 Mar 2026	LSB issues formal public censure and directs performance targets. Six failures include 'over-reliance on information provided by SSB itself, rather than independent verification'.	LSB Decision Notice; LSB news, 5 March 2026
12 Mar 2026	SRA publishes performance targets. Independent evidence required in investigations (3.5); assessment measured by officer agreement (3.3).	SRA performance targets 2026
21 Apr 2026	SRA Board: assessment time down from 60 to 42 days; proportion of reports investigated down from 18% to 15%.	SRA Board performance report, key achievements and para 11
18 May 2026	SRA confirms assessment work is outsourced to three panel firms (c.50 staff); subjects are contacted before any investigation.	Legal Futures
26 Jun 2026	SRA Director of Investigations: 'We will be reviewing the application of our Assessment Threshold Test this year.'	SRA letter to Blind Justice
1 Jul 2026	SRA to a requester: closure statistics by theme would need 'manual review of individual case files'.	SRA Transparency Code response
13 Jul 2026	Ministry of Justice review of the LSB warns against 'tick-box' compliance that does not reduce harm.	Independent Public Bodies Review of the LSB
4 Aug 2026	Defence firm records a report closed 'within four days' of the solicitor's representations.	Saunders Law client note

Date	Event	Source
3 Sep 2026	PM Law review published: explanations 'taken at face value'; investigation closed on unverified explanations. LSB: reforms not yet 'consistently delivering improved outcomes'; further action.	Jenner & Block for the SRA; LSB news, 3 Sept 2026
11 Sep 2026	SRA updates its public reporting page: it may not investigate where it 'wouldn't be able to contradict a likely reasonable explanation'.	sra.org.uk, Reporting a solicitor or firm to us
2026	Decisions C, D and E issued. C closed on the officer's own supposition and the burden returned to the reporter; challenged on verification; D closes it again 'given the explanation provided'. E relies on a client care letter recorded as 'amended at a later date'. No verification step stated in any.	Letters held by Blind Justice

1. What the SRA says it does

The SRA publishes the test it applies to every report. It has three stages.

'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?'

SRA, Making decisions to investigate concerns, sra.org.uk, opened 15 September 2026

The guidance says that at the first stage the SRA 'will not take as read a complainant's description of events, but will use our own judgment to identify the relevant issues'. At the third stage it says this:

'we take into account the evidence given to us and that capable of being gathered in support. We bear in mind any references to available evidence and what we think we could realistically get from the complainant, the firm or individual complained about, or from any third party.'

SRA, Making decisions to investigate concerns, stage 3

So the test, on its face, contemplates evidence being gathered, from the firm and from third parties, before the question of proof is answered. The SSB review, summarising the SRA's guidance on investigations, says the same: 'the SRA seeks evidence and explanations from those it is investigating, and where necessary from third parties' (paragraph 136). The guidance draws no distinction between an explanation and evidence of it.

What the SRA told the profession assessment does

The SRA introduced its Assessment and Early Resolution process part way through 2018/19. For four consecutive years its annual report on professional standards described the process in the same sentence.

'This involves us talking further, as necessary, with the person who raised the concern with us, the firm or the solicitor involved and/or contacting a third party. This allows us to obtain, gather and verify information, which often provides the opportunity to resolve the matter at an early stage without the need for further investigation.'

SRA, Upholding Professional Standards 2019/20, published 22 July 2021; repeated in the reports for 2020/21 and 2021/22

Each of those reports links the process to the fall in referrals: 'Since introducing this new approach, we have seen almost a 37% decrease in the number of concerns we refer for investigation (dropping from 3,602 in 2018/19 to 2,279 in 2019/20)', and in later years 'a steady decrease'. The 2022/23 report, published on the 20th of December 2024, keeps the phrase 'obtain, gather and verify information' in a shortened form of the sentence and places directly after it a sentence that each earlier report carries elsewhere: 'Where necessary, we will take witness statements, visit firms in person and analyse evidence, for example, bank accounts, financial statements and other documents.' The report for 2023/24, published on the 2nd of February 2026, contains neither 'verify' nor 'gather'. Assessment is described in one sentence: 'We

introduced AERT and an accompanying new process partway through 2018/19.’ The claim that assessment verifies information was made for four years and has been dropped. Nothing published explains why.

What its worked examples show

Blind Justice coded twenty-five worked examples and case studies identified across five SRA pages on reporting a solicitor and deciding whether to investigate; a further process example from the on-site investigations guidance is included separately in the published dataset. Twenty-five scenarios, with the coding categories fixed before reading. Eleven end in no further action or a stated ‘unlikely to investigate’ branch. None of the eleven records any independent corroboration of the regulated person’s account before closing. Three rest on that account, or on remediation the firm reports, alone: the capacity example below; a firm whose email was hacked, where ‘the money has been replaced swiftly by the firm or its insurers’; and a competence example closed with no further action because ‘the firm has confirmed it has checked all other matters held by Solicitor A and no other concerns have been identified’. Six are decided on the reporter’s account alone with no enquiry described. For balance, of the fourteen scenarios that end in investigation or other action, eleven record an independent source. The SRA’s own illustrations, read together, show verification happening once a matter is investigated and not before.

The SRA’s own benchmark for checking

The SRA’s guidance on how it gathers evidence, published in November 2019, lists transparency among its principles, defined as ‘ensuring and demonstrating that we have checked all relevant facts’, and names clients, people affected, courts, police, other regulators and firm employees as sources. Its fourth worked example is this.

‘Mr J tells us that £100,000 seems to have gone missing from his father’s estate. We urgently visit A & Co and use our powers to require the solicitor to provide information about the estate and ask him to explain what has happened to the money. His explanation is plausible, but not entirely convincing. We check it with Mr J who shows us documents proving that the solicitor’s explanation was misleading.’

SRA, How we gather evidence in our regulatory and disciplinary investigations, Example 4

In the SRA’s own example, an explanation that is ‘plausible, but not entirely convincing’ is the trigger for a check, and the check is made with the person who reported. That is the standard this briefing applies to the letters below. It is not a standard invented by Blind Justice.

What the public is now told

The SRA’s page for members of the public, Reporting a solicitor or firm to us, was updated on the 11th of September 2026. It says a concern ‘must meet all three of these conditions from the outset in order for us to investigate it’, and that the SRA ‘may decide not to investigate if the evidence we have doesn’t support the reported concerns and if we don’t think we’ll be able to get evidence that does support them’, for example where ‘we wouldn’t be able to contradict a likely reasonable explanation by the firm or solicitor for what they did’. The sentence assumes the explanation before it has been given, and asks whether the SRA could contradict it rather than whether it is true. Nothing on either page says what testing, if any, an officer must do before treating an explanation as likely, reasonable or beyond contradiction.

The SRA’s case studies for people thinking of reporting a solicitor, published on the 23rd of May 2024, are more candid about what happens next. Example 3 concerns a will made by a person who may have lacked capacity.

‘In considering whether we should investigate this, we will ask the solicitor to provide us with information as to how they reached the decision on capacity. If a solicitor shows that they thought about the issue, made any appropriate enquiries and reached a rational decision, we are unlikely to investigate.’

SRA, Case studies about reporting a solicitor, Example 3, sra.org.uk, published 23 May 2024, opened 16 September 2026

The solicitor ‘shows’; the SRA is ‘unlikely to investigate’. The case study does not say that anything the solicitor shows is checked against the will file, the medical record or the reporter. It is the mechanism this briefing describes, stated by the SRA as its intended practice.

The template

In June 2025 the SRA’s Board received its annual paper on corporate complaints. It records that in October 2024 the assessment team ‘developed a templated document which drives the Investigation Officer to set out the issues reported to us, the steps we have taken to investigate, and clear reasons for our decision not to investigate’. The letters examined below were written under that template. The paragraph headed, in substance, ‘how we assessed the report’ is where a verification step would be recorded if one had been taken.

On the 26th of June 2026 the SRA’s Director of Investigations, Richard Robinson, wrote to Blind Justice in response to an earlier briefing on assessment-stage decisions. He described what an assessment includes: a review of the regulatory information the SRA holds about the subject, listed as intelligence shared by other regulators, prior regulatory decisions, the regulatory record including previous reports, and open and closed investigations and applications. Nothing in the list is external to the SRA’s own files. He confirmed that the SRA ‘will be reviewing the application of our Assessment Threshold Test this year’, that it has ‘quality assurance processes and various check points in place’, and that its priority is for assessment to be ‘risk-based, evidence-led’. He also gave the volume: reports assessed rose from 11,378 to 16,499 between November 2022 and October 2025, an increase of 45 per cent.

2. What the SRA’s own record shows

The SRA has, in its own documents, described the method and on one occasion apologised for it.

The Board paper of July 2024

The SRA’s annual paper to its Board on corporate complaints for the year to October 2023, dated the 9th of July 2024, reports on complaints of bias. It records one upheld.

‘We upheld one complaint of perceived bias. We were satisfied the decision we made was fair and we had not discriminated against the complainant. However, we understand why the complainant perceived we had been unfair because we repeated the solicitor’s explanation in the closure letter without being clear it was the solicitor’s explanation. Feedback was provided for learning.’

SRA Board, SRA Corporate Complaints November 2022 to October 2023, 9 July 2024, paragraph 27

The sentence describes precisely what the five letters in section 7 do: the solicitor’s explanation is written into the closure letter as the SRA’s conclusion. The SRA treated it as a presentational fault in one letter. The Independent Reviewer had already treated it as a pattern.

The Independent Reviewer’s recommendation of 2022

The Reviewer’s report for the year to October 2022 records eight recommendations, three of them on the SRA’s procedures. The third of those was that, ‘where the SRA’s responses include information obtained from a solicitor who has been the subject of a complaint, it should be made clear whether that information had come from the individual concerned or from a representative of his/her firm’. A recommendation of that kind is only made because the Reviewer has read closure letters in which information from the solicitor is presented without saying so.

A closure the SRA described itself

In February 2025 the SRA reopened a matter concerning a public figure who had described himself as a solicitor. Its spokesman explained the original closure.

‘We looked at that issue at the time we became aware of it and contacted Mr Reynolds about the profiles. The materials were corrected, and we closed the matter with no further action based on all the evidence we had at the time. However, we’ve now become aware of further information, so we will look at this.’

SRA spokesman, quoted in Legal Futures, 21 February 2025

Contact with the subject, a correction, closure on ‘all the evidence we had at the time’, and a reopening only when a third party supplied more. It is the sequence recorded in the SDT cases in section 4, described by the SRA in its own words.

Who does the assessing

In May 2026 the SRA confirmed to Legal Futures that part of the assessment work is outsourced. Its spokesman said: ‘The work outsourced is to assess complaints against our criteria to see if they warrant further investigation – only if that is the case would the subjects of the complaints be considered “under investigation”, and any investigation would only be undertaken by SRA staff.’ Practitioners had complained that letters on SRA letterhead, signed by a named ‘Investigation Officer’, were in fact coming from three of the SRA’s intervention panel firms, which had provided around fifty staff, and that solicitors were ‘routinely asked’ for information about their clients as part of the assessment. So the enquiry of the solicitor that decides most reports is, in part, made by other solicitors employed by private firms under contract.

The regulated side describes the same method

The firms that act for solicitors under enquiry describe assessment from the other side of the desk, and their accounts match the letters. Saunders Law, on the 4th of August 2026, described a report by a former employer that the solicitor had misled a client and a supervising partner.

‘The SRA contacted T, who had since taken up employment at a new firm, asking T for a response to the allegations. T promptly instructed Ali Parker at Saunders Law. Within two weeks, Ali sent a detailed explanation and legal representations to the SRA. Within four days of receiving those representations, the SRA decided not to investigate the matter further.’

Saunders Law, client note, 4 August 2026

Brett Wilson LLP tells prospective clients that the SRA ‘may take no action having been satisfied with the explanations it has received’. Kingsley Napley describes the assessment team’s ‘emphasis on early engagement with either or both of the person who made the report and the person/firm who is the subject of the concerns raised’. Regulatory Defence Ltd advises that ‘the single most important moment in an SRA investigation is how you respond to the first letter’ and describes ‘the approach that closes a case’. JMW Solicitors say that ‘early specialist advice on how information should be presented can be determinative’. None of these firms is criticising the SRA. They are selling a service, and the service is the explanation.

3. What three independent reviews found

Axiom Ince, October 2024

The Legal Services Board commissioned Carson McDowell LLP to review the SRA’s conduct before its intervention into Axiom Ince, where more than £60 million of client money was found to be missing. The review found that the SRA ‘did not act adequately, effectively and efficiently’. When a forensic investigation

officer noticed a difference of about £28,000 in the firm's reconciliation, the officer 'contacted the firm to obtain an explanation'.

'The firm explained that the difference had arisen following Axiom's recent purchase of DWFM Beckman and that the funds were actually held in the DWFM Beckman client account. The balance had not been transferred to the Axiom client account. Documentary evidence provided by the firm supported this explanation. This was accepted and the matter was therefore closed.'

Independent Review of the Regulatory Events leading up to the SRA's intervention into Axiom Ince Limited, Carson McDowell LLP for the LSB, October 2024, paragraph 97

'The SRA's procedure did not require the FIO to make direct contact with the firm's bank to verify the client account balances. The SRA placed its trust in law firms to provide FIOs with bank statements and a confirmatory letter from the firm's bank.'

Axiom Ince review, paragraph 102

The documents that 'supported this explanation' came from the firm whose explanation they supported. Later, after a partial intervention, the SRA asked the firm to open a new client account to ring-fence tainted funds. The firm said it was not practical. 'The SRA accepted the firm's explanation and allowed the firm to continue trading until the full intervention into the firm in October 2023.' (paragraph 394).

SSB Group, October 2025

A year later the same reviewers examined how the SRA had handled more than one hundred reports about SSB Group, the Sheffield firm whose collapse left thousands of clients facing costs they had been told they would never pay. This time the findings were about the assessment stage itself.

'In our view, the way that the ATT was applied by the SRA to reports about SSB was ineffective. This resulted in reports not being investigated when, in our view, an effective assessment ought to have led to more investigations being carried out at an earlier stage.'

An independent review of the regulation of SSB Group Limited by the SRA, Carson McDowell LLP for the LSB, October 2025, paragraph 13

'In addition, the SRA did not make sufficient use of its investigatory powers and placed the onus on complainants to provide it with evidence to support their report.'

SSB review, paragraph 26

'SSB advised the SRA that it had no concerns about being able to discharge its short-term liabilities. It appears that the SRA accepted this at face value, despite the contradictory evidence which showed that the firm was in dire financial straits.'

SSB review, paragraph 159

The reviewers also found that reports were treated differently according to who made them. One member of the victims' group told them of 'a very different response from SRA staff' when they called 'under the pretence that they were a solicitor, rather than a member of the public'. The reviewers found the 'two tier approach' reflected in internal SRA correspondence, quoting one member of staff asking a colleague: 'Do you have any interest in some busy body talking about Novitas losses?'. Paragraph 134 records that 'the majority of reports from individual clients of SSB 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'. The clients whose reports were closed included one who told the SRA 'the situation is making him very ill' and a 77-year-old on pension credit facing a 'totally unaffordable bill of £18,000' (paragraphs 131 to 134; the clients' accounts at paragraph 42).

The reviewers' first recommendation on assessment went to the wording of the test.

'the wording of the ATT (as to whether the breach is capable of proof), as well as the relevant training/guidance provided to SRA staff, should be reviewed to ensure that the onus is on the SRA to consider whether it should investigate, not on the complainant to provide evidence to support their report.'

SSB review, paragraph 31

On the 16th of October 2025 the LSB published the review and announced its intention to censure the SRA and to direct performance targets. Its interim Chair said the SRA 'must sharpen its approach to assessing the reports it receives about solicitors or firms'. The SRA's Chair, Anna Bradley, said the same day: 'We fully accept the recommendations of this review and are committed to doing all we can to learn from this event and to implement its recommendations.'

PM Law, September 2026

PM Law Group was intervened into in February 2026. The SRA commissioned Jenner & Block LLP to conduct a serious event review of its own handling, and published it on the 3rd of September 2026. The review examined the reports the SRA had received about the group and its 2025 forensic investigation.

'The Reports present certain common themes, including: the SRA taking the PM Law Group's explanations at face value and opting not to investigate further; the SRA treating Reports as discrete compliance failings; the SRA not identifying accumulator firm-related risks; and indicators that the SRA did not accurately understand the PM Law Group structure.'

Serious Event Review: PM Law, Jenner & Block LLP for the SRA, September 2026, paragraph 5.5

The examples are assessment-stage closures of the kind examined in this briefing. In March 2024 the SRA received a report 'concerning the retention of £155,000 of completion monies from a conveyancing transaction and a failure to redeem the mortgage'. The review records that the firm 'discharged the mortgage once notified by the complainant' and 'attributed the failure to an internal error in its banking system, which it said was undetected at reconciliation. The SRA closed its investigation with no further action.' Two similar reports in July 2024 'were attributed to an "oversight" and technological issues respectively. The SRA closed both Reports with no further action, save for a requirement that a competency compliance declaration on the oversight of undertakings be provided' (paragraphs 5.10 and 5.11). On the forensic investigation of 2025:

'FIO1 accepted at face value information provided by PM Law Limited and did not independently verify it. The information provided about the consideration paid for acquired firms was inaccurate and FIO1 did not check it against the acquisition agreements they obtained. ... Further, they did not independently verify explanations they were provided with for the high volumes of complaints. FIO1 told us in interview: "it seemed to be a professional organisation, there were a lot of people involved and a lot of oversight, it seemed unlikely that they would be telling you something that everyone knows is wrong".'

PM Law review, paragraph 7.62.3

The investigation 'closed with a "no concerns" finding' (paragraph 4.3.3). The officer's sentence in interview is the clearest statement on the public record of the assumption this briefing is about: that a regulated firm would not say something untrue to its regulator. Three reviews, of three firms, with a combined loss of client money the LSB puts at approximately £100 million for Axiom and PM Law alone, have now found that assumption at work.

4. When the explanation was false

The cost of a method that accepts explanations is measured in the cases where the explanation was untrue. Two kinds of public record show it: a court holding an SRA closure wrong, and the Solicitors Disciplinary Tribunal finding, in the SRA's own prosecutions, that what a solicitor told the SRA was false.

An assessment closure whose reasoning the courts held wrong in law

On the 18th of November 2024 a director of Goldsmith Bowers Solicitors made a self-report to the SRA about the position of an employee, Mr Middleton, who was conducting litigation. On the 2nd of December 2024, fourteen days later, the SRA decided not to investigate. Its letter is quoted in full by the Court of Appeal.

'[GBS] is authorised under the [2007 Act] arrangements as it is a firm authorised and regulated by the SRA under the powers delegated to it under the Act. Its employees are permitted to undertake "reserved activities" due to Section 21(3). We are satisfied Mr Middleton has not conducted a reserved legal activity without entitlement to do so, so are satisfied no further action is required on this occasion.'

SRA decision not to investigate, 2 December 2024, quoted in *Mazur v Chartered Institute of Legal Executives* [2026] EWCA Civ 369 at [74]

'This amendment has not been published on the SRA website and could be a contributory factor in the defendants' complaint. Since this decision, Mr Ashall has always supervised Mr Middleton's work. Therefore, we are satisfied there are no concerns about the supervision of Mr Middleton's work by Mr Ashall or [GBS].'

The same letter, quoted at [75]

The letter was relied on by a Circuit Judge. On appeal, Sheldon J held that its conclusion on section 21(3) 'is clearly wrong' and that the judge's reliance on the SRA's confirmation that Mr Middleton had authority to conduct litigation under supervision 'was also an error' (*Mazur v Charles Russell Speechlys* [2025] EWHC 2341 (KB) at [63] to [64]). The Court of Appeal said the letter 'was wrong in law' and that 'the SRA later reversed its position on section 21(3)' ([2026] EWCA Civ 369 at [196]). The letter's statement that the employee 'has always' been supervised gives no source but the firm that made the report. Fourteen days after a self-report, the SRA was 'satisfied' on both the law and the facts, and was wrong on the law. Two qualifications belong here. The Court of Appeal allowed CILEX's appeal on the wider question in the case, and at [197] it recorded the supervising solicitor's evidence that he 'supervised Mr Middleton by meeting and speaking regularly on individual cases'. The courts made no finding that the firm's account of supervision was untrue, and this briefing makes none. The point is narrower: the SRA closed a self-report in fourteen days on a legal analysis the Court of Appeal called wrong and the SRA itself later reversed, and on a factual assurance whose only stated source was the firm.

The Tribunal cases

The SRA prosecutes before the Solicitors Disciplinary Tribunal, which hears and determines the allegations, solicitors who mislead it. The Tribunal's published judgments record the sequence in each case: what the SRA was told, and how it found out otherwise. For this briefing every judgment published on the Tribunal's website from 2015 to the 16th of September 2026 was screened, 833 cases and 832 judgment documents, and the 271 matching the twenty-one search terms were read in full. Sixty-seven of them contain a proved or admitted finding that the respondent gave the SRA false, inaccurate or misleading information in the course of an enquiry, assessment or investigation; dishonesty was found in 59 of them. The corpus list, the screening terms, the coding categories written before any judgment was read, the 67-case dataset and the 204 exclusions with reasons are published with this briefing.

The first result cuts against the simplest version of this briefing's argument and is stated first. In 43 of the 67 cases the material that exposed the falsehood came from the SRA's own officers cross-checking documents: bank records, Land Registry and Companies House entries, the firm's own files and emails. In 21 it came from outside: an opposing party or firm in eight, a complainant or client in six, an employer or the respondent's own firm in four, another regulator in two, a public record in one. Two were admissions and one judgment does not say. The SRA can find a false explanation. It does so when it checks.

The second result is where it checks. Forty of the 67 statements were made during forensic investigations alone, and thirty of those were caught by the forensic officer's own work, which is what condition 3.5 of the performance targets now requires of investigations. Eleven were made at the assessment or early enquiry stage. Of those, eight came to light from outside the SRA and three from an officer's own check. The numbers at assessment are small and are stated as small. Their shape is the argument of this briefing: verification catches false explanations, and the stage at which no verification is required or recorded is the stage at which the SRA almost never catches one itself.

Six cases are set out below as illustrations of the sequence. They were chosen before the corpus was read and are not a sample of it.

In Kearney (12750-2025, judgment on an agreed outcome, 17 October 2025), a creditor reported the firm in February 2022 with evidence of three unsatisfied and fourteen satisfied county court judgments. The agreed facts record that at a meeting on the 19th of January 2023 the SRA's forensic investigation officer 'was advised that Mr Hardwick and the Respondent did not have any concerns regarding the Firm's ability to meet its short-term liabilities, the CCJs had been satisfied, the financial issues were "mainly historic"', and that the officer 'cannot recall whether the Respondent gave the express assurance' herself. The SRA learned of a winding-up petition from its own investigation officer in April 2023; the firm entered administration on the 5th of June 2023. In Ilyas (12822-2025, judgment 8 July 2026), the defendant's solicitors in a personal injury claim reported in October 2023 that the claimant was an employee of the firm. Asked by the SRA's investigation officer to identify the person using an email address on the file, the solicitor said on the 21st of November 2023 that it 'belonged to MS who was employed as an administrative assistant at the Firm'. The Tribunal found that he knew 'the S email address did not belong to MS' and that the statement was dishonest; the officer had 'raised further enquiries after noting that the staff list provided did not include a MS'. In Heer (12499-2023, judgment 8 March 2024), the SRA's attendance note of the 25th of October 2021 recorded the solicitor confirming that 'he has done no legal work on these files at all'; on the 21st of December 2021 the SRA 'were contacted by' the purchaser's solicitors in a conveyance in which the firm was still acting for the seller, who 'queried the status of the Firm'. In Chouhan (12457-2023, agreed outcome, 20 July 2023), a suspended solicitor told the SRA by email that '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'; the opposing party in a debt matter, 'having discovered that the Respondent was not a practising solicitor as evidenced by the Law Society website, reported him to the SRA'; he was struck off, the Tribunal recording that 'he provided dishonest answers'. In Crosby (12658-2024, judgment 3 March 2025), the solicitor supplied the SRA's forensic investigation officer with five letters he said had been sent to a client; 'On review of the five letters ... the FI Officer identified various inconsistencies, contradictions and omissions in three of them' against contemporaneous emails. In Clapton (12873-2025, agreed outcome, 12 May 2026), the explanation given for a delay was contradicted by the employer's own record that 'the Respondent was present in the workplace' on the days in question; 'On 30 May 2024, the SRA received a report from Ms Walker', her line manager.

In every one of these six the SRA was told something untrue or incomplete, and in every one the truth emerged only through information or records from outside the solicitor's account. In two, Heer and Clapton, a third party wrote to the SRA. In two, Chouhan and Ilyas, the SRA already held a report from an opposing party or firm against which the statement could be tested. In two, Kearney and Crosby, the SRA's own officers found it, from a winding-up petition and from the firm's own emails. What none of the six shows, and what none of the 67 shows, is a false explanation detected by the explanation itself. A method that asks the solicitor and accepts the answer does not detect a false answer. Something outside the answer does.

5. What the regulator promised, and what it measures

On the 5th of March 2026 the LSB issued its formal public censure and directed the SRA to set and publish performance targets within seven days. The LSB's statement listed six areas in which the SRA 'fell short of the standards expected of a regulator', including 'over-reliance on information provided by SSB itself, rather than independent verification' and 'underuse of the SRA's statutory powers to investigate and gather evidence'. Its interim Chair, Catherine Brown, said the SRA 'must demonstrate, through its actions, that it has fundamentally changed its approach'.

The SRA published its targets on the 12th of March 2026. They are organised by the conditions in the LSB's direction. Condition 3.5, 'remedying underuse of statutory investigatory powers', requires that 'investigations seek independent evidence and, where the firm poses considerable risk, ensure that this is not solely firm-provided material', with a target that by December 2026, 80 per cent of file reviews on closed cases 'confirm correct approach taken to seeking independent evidence'. That condition is written for investigations.

Condition 3.3, 'remedying inaccurate and inconsistent assessment and triage', is the one that governs the desk where the five letters were written. The SRA records that in summer 2025 it introduced 'new Assessment Plans to ensure consistency of decision making in the application of our Assessment Threshold Test' and trained officers on them. The indicators it reports against are these: 80 per cent of stage 1 complaints about the SRA not upheld; new starters' closure recommendations checked until they are 'deemed fit to be granted self-signoff'; and 'quality assurance reviews demonstrate 90%+ agreement between reviewing officer and case officer in the application of the ATT across sampled cases'. Nothing in condition 3.3 asks whether the explanation on which a report was closed was tested. Two officers who agree to accept it meet the target.

On the 3rd of September 2026 the LSB reviewed the SRA's progress against its earlier Axiom directions, which had fallen due in June. It relied on two reports: the Jenner & Block review of PM Law and an independent assessment by the Berkeley Partnership. The Berkeley assessment found that 48 of 60 implementation steps were fully met, five partly met and seven were future actions, and that 'while processes, frameworks and controls are largely in place, their effectiveness in practice is not yet fully evidenced'. The LSB concluded:

'Having reviewed the available evidence, the LSB has concluded that there is not sufficient evidence to demonstrate that the changes introduced by the SRA are consistently delivering improved outcomes for the public and consumers.'

LSB, LSB intensifies action to improve SRA performance and protect consumers, 3 September 2026

It kept the Directions and performance targets in place and said it anticipated 'urgently setting additional performance targets'. Two months earlier the Ministry of Justice's independent review of the LSB itself had warned that measures of process 'tend to act as proxy indicators rather than direct measures of outcomes', with the result that 'a regulator may meet all procedural "tick-box" requirements while still failing to improve outcomes or reduce harm' (Independent Public Bodies Review of the Legal Services Board, July 2026).

6. Under what pressure the decisions are made

The SRA's Board performance reports for the same period record the conditions in the assessment team. Reports received rose from an average of 1,024 a month in 2023/24 to 1,375 in 2024/25, and October 2025 was 'a record month with 2,197 reports received'. Between July and October 2025 only 38 to 54 per cent of cases were resolved within two months against a target of 80 per cent, and the January 2026 report describes assessment as 'a material exception on performance delivery'.

By the April 2026 report the picture had changed. The SRA ‘increased the average monthly report assessment closures by 32% compared to the prior year level’ and ‘the average days to complete assessments reduced from 60 in October 2025 to 42 days in February 2026’. This ‘followed the redeployment of lawyers and support from senior decision makers in the wider Investigations directorate to deliver a second triage stage to identify lower risk matters that can be dealt with more quickly’. The same report records the consequence for investigations: a 7 per cent rise in investigation cases against a 45 per cent rise the year before, which ‘reflects a material reduction in the proportion of reports being investigated, from an average of 18% in 2024/25, to 15% in 2025/26’ (key achievements; paragraphs 7 and 11).

Faster closure does not prove weaker decisions. But a second triage whose purpose is to find matters that ‘can be dealt with more quickly’, run by redeployed staff under a target for speed, with a quality measure that counts agreement between officers, is a process built to close reports. The three 2026 letters in this briefing were written inside it.

7. What the letters show

Blind Justice holds five decision letters from the SRA’s assessment stage: two dated 2025, before the SSB review, and three dated 2026, after it. Two arose from civil litigation in which the reporter was a litigant in person and the firm reported acted for the other side. Two concern a single report made by the charity about the way a solicitor’s professional status had been described in public material. One concerns a report by a member of the public, supported by the charity, about the conduct of a criminal defence case. They were written by three different investigation officers. Names, firms, case numbers and identifying detail have been removed. The regulated persons are not named and nothing here should be read as a finding about any of them.

Each letter was read in full and each concern within it coded. What is the source of the fact on which the concern is closed: the reporter’s material, the regulated person’s explanation, the SRA’s own records, an independent document, or the officer’s own supposition? Three further questions are recorded separately, because they are different things: does the letter engage with the reporter’s evidence; does it record an enquiry of the regulated person; and does it record any independent verification of what the regulated person said? Then: does it defer the matter to a court or another body, and does it return the burden of proof to the reporter? The coding frame and the full coding are in the annex. The briefing reports only what each letter records; silence about a step is not proof that the step was not taken, but the template exists precisely so that the steps taken are set out.

Decision A, 2025: the firm confirms

A report raised eight concerns about a firm acting for the opposing party in litigation, including that it was acting in a conflict of interest and that it had sent the court an order containing content that had never been agreed. The letter describes its method in one sentence: ‘We were able to obtain an explanation from the firm to assist the investigation.’ On the conflict:

‘The firm has confirmed that there is no basis in which its interest or the interest of its client are conflicted, or could be potentially conflicted by virtue of the allegations made by [the reporter]. ... We are of the view that the circumstances in this matter meet the criteria for an exception to apply.’

Decision A, 2025

On the order:

‘The firm has explained that it emailed the court on [date] with a copy of an Order. However, the firm states that it was apparent in the email that the Order remained in draft form. ... 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 A, 2025

The email to the court, the draft, and the court's file were all obtainable. None is recorded as obtained. On an allegation of collusion between two solicitors on opposing sides, supported by email extracts: '[The solicitor] has confirmed that the only correspondence he has engaged in ... is in relation to [the reporter]'s claim. [The solicitor] states that he has not colluded ... We therefore conclude the concern raised is not capable of proof.' The reporter was told three times that if any findings were made against the solicitor in court, they should be forwarded to the SRA, 'and we can investigate further at that time if appropriate'. On one concern, whether a defence had been struck out, the letter records that the firm 'confirmed and provided evidence', and that is noted here in fairness: it is the only concern in Decision A where a document is mentioned, its nature is not stated, and it came from the firm. Decision E, below, names the document it relies on. The letter closes with the pattern test: 'Upon reviewing the regulatory history of the firm there is nothing to indicate that this concern forms part of a pattern of behaviour.'

Decision B, 2025: the paired file

The companion letter, on the second solicitor in the same collusion allegation, quotes three of the reporter's emails and concludes that they do not evidence collusion. It is the one letter of the five in which an officer engages with the reporter's own evidence on the page, and it is recorded here for that reason. It records no enquiry beyond 'an explanation from the firm' and closes on 'not capable of proof'. Read together, A and B show the same allegation, against two solicitors, closed on each solicitor's own denial.

Decision C, 2026: the officer's guess

A report by the charity concerned public material that had, for a period, described a solicitor as holding a professional status the solicitor did not then hold. The officer did not ask the solicitor. The letter reasons as follows.

'We consider it likely this was an inadvertent oversight ... rather than as a result of [the solicitor]'s direct actions. ... we are satisfied no further action is required in this regard.'

Decision C, 2026

'it is likely ... In the alternative ... may have ... In the absence of clear evidence ... we are satisfied no further investigation is necessary. If [the reporter] can provide clear evidence ... we invite [the reporter] to provide this for further consideration.'

Decision C, 2026

Every sentence of the reasoning is a supposition, 'likely', 'in the alternative', 'may have', and the burden is returned to the reporter in the last one. The facts that would have settled the question are on the SRA's own register. The letter does not say they were looked at. This is the construction the SSB review had described months earlier: the onus on the complainant to provide evidence to support their report.

Decision D, 2026: challenged, then closed on the reply

The charity challenged Decision C on the ground that the SRA had accepted a position without identifying what verification steps had been taken. The officer undertook to write to the solicitor. Some months later the officer wrote to the charity with the result. The letter summarises the challenge accurately, sets out the solicitor's explanation at length, and concludes:

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

Decision D, closure email, 2026

The explanation was that the solicitor did not recall who had written the material, that the wording was at worst careless, and that anything done in the period in question had been done with permission and under supervision. Each of those statements could have been tested against records the SRA holds or the public record. The letter does not say that any was. It does not give the date on which the officer wrote to the solicitor or the date of the reply. The charity asked for both, and for a statement of what, if anything, was verified.

The SRA has since answered, through its service complaints process. Its complaints manager wrote:

'Aside from the information provided by our [internal] team, we did not seek further evidence. [The officer] was satisfied that the response received from [the solicitor] were sufficient and further investigation was not required.'

SRA complaints manager to Blind Justice, 2026

The same process found that the assessment had 'reached a reasonable outcome decision' and identified 'no material flaws'. It acknowledged that the enquiry the officer had undertaken to make was made more than four months later, described this as 'a significant delay', and apologised. The file was closed eleven days after the officer's letter to the solicitor went. A further report about the same matter, submitted by the charity as a new report and expressly not as a request to revisit the decision, was answered inside the same service complaint: the complaints officer had 'not identified any information or potential conduct concerns, which require that further assessment'. It was not given a reference of its own.

The sequence is the core exhibit of this briefing. A report was closed on conjecture. The closure was challenged expressly on the absence of verification. The officer's response to a challenge about verification was to ask the person reported, and to close the file on the answer. Set against the SRA's own Example 4, in which a plausible explanation is checked with the reporter, the contrast is complete: here the reporter was not asked anything, and the explanation was the end of the matter. The SRA has now said so itself: it did not seek further evidence, and the solicitor's response was sufficient.

Decision E, 2026: the amended document

A report by the mother of a criminal defence client alleged that an unqualified member of staff had conducted the case without supervision by a solicitor. The officer disposed of the supervision allegation on a single document supplied by the firm.

'The SRA have been provided with a copy of the firm's client care letter, dated [date]. 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].'

Decision E, 2026

The officer records that the document is not the original and has been altered, and relies on it in the following sentence. The letter records no request for the original. No other document is mentioned. Who conducted the case is a fact recorded in the court's own file, in the legal aid record, and in the firm's correspondence with the client; none is referred to. The letter adds that 'no adverse judicial findings were recorded about the actions of the law firm during the proceedings' and that the risks to the public were low.

The method, across the letters

Five features recur. First, the regulated person's explanation is recorded and then treated as the finding: 'the firm has confirmed', 'the firm confirms', 'given the explanation provided'. Second, where no explanation is sought, the gap is filled by the officer's own supposition about what was 'likely'. Third, the burden of proof is placed on the reporter: 'if [the reporter] can provide clear evidence'; 'not capable of proof'. Fourth, anything arising in litigation is deferred to the court, with an invitation to return if a judge criticises the solicitor, which is to say that the regulator will act once someone else has done the work.

Fifth, the pattern test is run against the SRA's own records of the same person, so whether a pattern is seen depends on the SRA connecting what it already holds. The SSB and PM Law reviews both found that it did not. Every letter ends with the same sentence: the person who made the report has no right of appeal or review.

8. The five decisions, coded

The table summarises the coding. 'Closed on the regulated person's account' counts concerns whose closing fact is the firm's or solicitor's own confirmation, explanation or denial. 'Verification recorded' counts concerns where the letter records any check of that account against a source outside the regulated person. 'Deferred' counts concerns answered by reference to the court, the Legal Ombudsman or the ICO. Concern-by-concern coding is in the annex.

Decision	Year	Officer	Concerns	Closed on the regulated person's account	Verification recorded
A	2025	1	8	4	0 (one document, supplied by the firm, nature not stated)
B	2025	1	3	1	0
C	2026	2	1	0 (officer's own supposition)	0
D	2026	2	1	1	0
E	2026	3	1	1 (document recorded as amended)	0
Total		3 officers	14	7	0

Decision	Deferred to court or other body	Burden returned to the reporter	Pattern test on the SRA's own records
A	6 (5 court, 1 ICO)	Yes ('not capable of proof')	Yes
B	2 (LeO, ICO)	Yes ('not capable of proof')	Not stated
C	0	Yes ('we invite [the reporter] to provide this')	Yes
D	0	No	Not stated
E	1 ('no adverse judicial findings')	No	Not stated
Total	9	3 of 5	

9. What cannot be counted

A reader will ask how often this happens. The answer is that nobody knows, and the reason nobody knows is that the SRA does not record it in a form from which it can be counted. In February 2017 it told a requester: 'Where we close a file after assessment we don't record a reason electronically.' In August 2019 it said that 'overturned' is not a recorded decision type and that its Reconsideration Policy 'does not relate to decisions not to investigate'. On the 1st of July 2026 it told a requester that statistics on Assessment Threshold Test closures by theme would require 'manual review of individual case files' and that narrowing the request 'would not avoid the need for manual case by case review'. Its published data gives closures by category, never by reason. A regulator censured for over-reliance on what firms tell it does not count how often it relies on what firms tell it.

Nor can a reporter obtain the reasoning from the SRA under its Transparency Code. Three requests by people who had reported a solicitor and asked for the outcome or reasoning of their own report were refused on identical grounds, absolute limitation 5 and qualified limitation 17: one on the 15th of March

2024, one on the 16th of June 2025, and Blind Justice's own on the 8th of April 2026. The 2024 refusal explains that 'providing details of specific complaints made about a firm into the public domain could discourage firms from cooperating with us' and that 'the publication of complaints which have not led to a regulatory outcome would be misleading for the public'. The 2025 refusal adds that such concerns 'can be escalated via the complaints process', the process that A Law Unto Themselves showed cannot change the decision.

The courts have recorded the deferral pattern too. In *Davies v Greene* [2021] EWHC 38 (Admin) the court noted that the SRA had declined to investigate or refer the same solicitor on three occasions, in February 2013, December 2018 and June 2019, and quoted its letter of the 13th of June 2019: 'We do not intend to initiate our own application. In addition, we do not intend to seek the Applicant's agreement to undertake the existing application.' The SRA relied on earlier court judgments, which is to say that it waited for the court.

What can be counted is the shape of the funnel over time. The SRA's own annual data, read across its changing labels, shows this.

Year	Concerns dealt with	Closed at assessment	Referred to investigation	Referred, per cent	Assessment timeliness
2018/19	9,649	5,108	3,602	37.3	median 4 working days
2019/20	9,375	6,021	2,279	24.3	median 18 working days
2020/21	9,329	6,959	1,816	19.5	not published
2021/22	9,972	7,117	1,741	17.5	not published
2022/23	11,137	8,064	1,712	15.4	80 per cent within two months, met
2023/24	11,421	8,317	1,763	15.4	met; average 39 days at October 2024
2024/25	c.15,000 resolutions	not published	c.2,868 (SRA: 18 per cent)	18 (SRA-stated)	target missed every month; 36 per cent in June 2025
2025/26 to April	not published	not published	SRA: 15 per cent	15 (SRA-stated)	54 to 59 per cent within two months; average 42 days by February

Sources: SRA Upholding Professional Standards 2018/19 to 2022/23; Investigations and enforcement annual data 2023/24; SRA Board performance reports January and April 2026. Business years run November to October. 'Closed at assessment' is the SRA's 'investigation not necessary' to 2021/22 and 'closed with no further action' from 2022/23, excluding redirected and out-of-jurisdiction matters. The assessment and early resolution process began during 2018/19; the timeliness measure changed twice; a second triage stage was introduced during 2025/26. Comparisons across those breaks are indicative only.

The proportion of concerns referred for investigation has fallen from 37 per cent to 15 per cent in seven years while the number of concerns has risen by more than half. The SRA's complaints data supplies the other half of the picture. In 2023/24 it responded to 1,069 service complaints at Stage 1 and Stage 2 together (802 and 267); 650 concerned its investigation work; 564 of those, 86.7 per cent on the SRA's own figure and 52.8 per cent of the combined Stage 1 and Stage 2 count, concerned a decision not to investigate. The year before the figures were 542 of 636 and of 1,044. The SRA's Board paper explains this as complainants not getting 'the resolution they personally want'. That is one reading. The other is that more than half of everything the SRA is complained about is the decision this briefing describes.

10. What complainants say, and who can hear them

The SRA's Independent Reviewer of Complaints reported on the year to October 2024 in an annex to the June 2025 Board paper. The Reviewer received 153 enquiries, 97 applications and issued 94 reports. Of those 94, 76 (81 per cent) concerned a regulatory decision, principally a decision not to take action after an allegation against the complainant's own solicitor (28), the solicitor acting for the complainant's opponent

(34) or another solicitor (7). The Reviewer writes that ‘in almost every instance, a complainant’s dissatisfaction about a regulatory decision lay at the heart of their complaint and, in many instances, that was all that was being complained about’, and that complainants ‘were disappointed that the SRA had declined to take matters further, generally because the SRA had taken the view that their Assessment Threshold Test had not been met’. The Reviewer’s remit is explicit: ‘We cannot overturn any regulatory decision taken by the SRA.’ No failing was found in 87 per cent of reports.

The SRA’s Board paper of June 2025 records that ‘decisions not to take regulatory action when a report is made is a key area of dissatisfaction for complainants’ and that it is ‘the area where complainants are most likely to go through all three stages of our complaints process’. The paper attributes this to the SRA being unable to give complainants ‘the resolution they personally want’. That is one reading. Another is that complainants can see, as three sets of reviewers could, that the person they reported was asked and believed.

The SRA’s page on Trustpilot carried 423 reviews and a rating of 1.1 out of 5 when it was read on the 15th of September 2026. These are unverified accounts by members of the public, self-selected, and are not treated here as findings. They are recorded because they describe, in their own words, the mechanism the letters above record. One reviewer in July 2026 wrote that the SRA ‘appeared more willing to defer to the firm’s explanations’. Another, in June 2026, that the SRA ‘declined to investigate and stated that they had seen the firm’s “internal reporting”’. A third, in July 2026: ‘I gave them email evidence but they don’t want to do anything. Case closed, they don’t want to help.’ Others in 2024 describe being told the assessor had asked the firm’s compliance officer and ‘received an explanation’, and material from a subject access request contradicting the firm’s position without the matter being reopened. Blind Justice is asking members of the public who have received a decision not to investigate to send it the letter, so that the coding above can be tested against a larger set.

11. Why it matters

A report closed at assessment produces no published outcome. The solicitor’s entry on the SRA register is unchanged and the Legal Ombudsman is not told. The SRA says it retains the report and that it can inform a later investigation; the SSB and PM Law reviews found that in practice the reports it held were not connected. The next client who checks the register finds nothing, and the next reporter who raises the same concern is assessed against a regulatory history that records only that a previous report was not investigated. The pattern the test looks for cannot form, because the test is what prevents it forming.

The SRA’s own numbers give the scale. In 2023/24 it closed 8,317 of the 11,421 concerns it dealt with without further action and referred 1,763 for investigation. Reports have since risen to a record 2,197 in a month, and the proportion investigated has fallen to 15 per cent. If the method recorded in these letters is the method applied at that volume, then the assessment stage is not a filter that tests reports. It is a stage at which the regulated person is asked, and believed.

Three reviews show what reliance on firms’ own accounts can cost. Across Axiom Ince, SSB and PM Law, independent reviewers identified instances in which the SRA accepted information or explanations from the regulated firm without sufficient independent verification. The LSB’s response was a censure, targets, and a finding on the 3rd of September 2026 that there was not yet sufficient evidence that outcomes had consistently improved. The SRA accepted the recommendations. The three 2026 letters are the evidence of what that acceptance has so far changed at the desk where reports are closed.

12. Recommendations

Blind Justice makes eight recommendations. They are addressed to the SRA and, where the SRA’s performance is under monitoring, to the LSB.

- 1. A verification requirement at assessment.** Where a concern is to be closed on the strength of an explanation, confirmation or document from the person reported, the officer should be required to test it against at least one source outside that person before closing, wherever such a source exists: the reporter, the court file, the SRA's own register and training records, Companies House, the Land Registry, the client, or the third party concerned. This is the SRA's own Example 4, applied at assessment.
- 2. The template to record the check, or its absence.** The templated decision document introduced in October 2024 should require the officer to state, under 'the steps we have taken to investigate', what was verified, against what, and on what date; or to state that nothing was verified and why.
- 3. Condition 3.3 to measure verification, not agreement.** The LSB should require the SRA to add to condition 3.3 an indicator matching condition 3.5: the proportion of sampled closures at assessment in which the regulated person's account was tested against independent material. Agreement between two officers is not a measure of whether either checked anything.
- 4. No closure on conjecture.** A concern should not be closed on the officer's own supposition about what 'likely' happened where the person reported has not been asked and the relevant facts are on record.
- 5. Altered documents.** Where a document supplied by the regulated person is recorded as amended, not original, or of uncertain provenance, it should not be relied on to close a concern until the original has been obtained.
- 6. A published audit of closures, by reporter type.** The SRA's quality assurance function should sample decisions not to investigate each quarter and publish the proportion in which a verification step was recorded, broken down by whether the reporter was a client, an opposing party, a solicitor or another body. The SSB review found a two-tier response by reporter type; the SRA has never published the figures that would show whether it persists.
- 7. Record the reason for every closure.** The SRA should record electronically, for every decision not to investigate, the ground on which it was closed and the source of the closing fact, and publish the totals annually. Until it does, neither it nor the LSB can say how often reports are closed on the regulated person's account alone.
- 8. Transparency on the threshold test review and the public page.** The SRA should publish the terms of reference of the review of the application of the Assessment Threshold Test referred to in its letter of the 26th of June 2026, its timetable, and the revised wording of the 'capable of proof' limb when settled; and should explain how the wording on its public page as updated on the 11th of September 2026, 'a likely reasonable explanation by the firm or solicitor', is consistent with paragraph 31 of the SSB review.

13. Questions for the SRA

These questions were put to the SRA in writing on the 17th of September 2026, the day of publication. Any reply will be published in full.

1. At the assessment stage, what step, if any, is an investigation officer required to take to test an explanation or confirmation received from the person or firm reported, before closing a report on the strength of it?
2. Does the SRA regard a regulated person's explanation, unsupported by any document obtained from a third party or from the SRA's own records, as a sufficient basis on which to conclude that a concern is 'not capable of proof'?
3. How does the SRA reconcile Example 4 of its guidance on gathering evidence, in which a plausible explanation is checked with the reporter and found to be misleading, with the wording on its public reporting page as updated on the 11th of September 2026, that it may not investigate where it 'wouldn't be able to contradict a likely reasonable explanation by the firm or solicitor'?

4. What has changed in the wording of the Assessment Threshold Test, or in the guidance and training given to assessment staff, since the SRA accepted paragraph 31 of the SSB review on the 16th of October 2025? Why does the published threshold guidance still carry an update date of the 30th of December 2021?
5. Under condition 3.3 of the performance targets, does quality assurance test whether an officer sought or considered independent verification before closing, or only whether a reviewing officer agrees with the case officer? Will the SRA publish the sampling method, sample size and findings?
6. Condition 3.5 requires independent evidence in investigations. Is there any equivalent requirement at assessment before a report can be closed? If not, on what basis can an assessment officer decide that a concern is incapable of proof?
7. Does the templated decision document introduced in October 2024 require the officer to record verification steps under 'the steps we have taken to investigate'? In what proportion of decisions not to investigate in the last twelve months was a verification step recorded?
8. How many assessment-stage closures in 2025/26 relied on an explanation from the person or firm reported, and in how many was that explanation corroborated, contradicted or left untested?
9. Will the SRA publish referral and closure rates by reporter type, and say what it has done about the two-tier response by reporter type identified in the SSB review?
10. What effect has the second triage stage introduced in late 2025 had on referral rates and on evidence-gathering at assessment? Will the SRA publish the sample sizes, error categories and disagreement rates from its quality assurance of that stage?
11. Of the 564 complaints about decisions not to investigate recorded in the year to October 2024, how many were upheld or partially upheld at any stage, and in how many was the decision reversed?
12. Will the SRA publish the terms of reference, and in due course the outcome, of the review of the application of the Assessment Threshold Test referred to in its letter of the 26th of June 2026?
13. The SRA's annual reports for 2019/20 to 2022/23 said the assessment process 'allows us to obtain, gather and verify information'. The report for 2023/24 does not. Does the SRA still describe assessment as a process that verifies information, and if not, when and why did that change?
14. Does the SRA now record, for each decision not to investigate, the reason for closure and the source of the information relied on? If not, when will it start, and how does it otherwise measure its own compliance with the LSB's finding on over-reliance on information from firms?

14. Method and sources

Every quotation in this briefing is taken from a document opened and read in full by Blind Justice on or before the 16th of September 2026. Public documents: the SRA's annual reports Upholding Professional Standards for 2018/19, 2019/20, 2020/21, 2021/22 and 2022/23 and Investigations and enforcement annual report 2023/24; the SRA's topic guides on competence and standard of service, driving with excess alcohol, on-site investigations, anti-money laundering, criminal offences outside practice, social media and Principle 1, and the Enforcement Strategy; every judgment published on the Solicitors Disciplinary Tribunal's website from 2015 to the 16th of September 2026 (833 cases screened and 271 read in full, of which 143 were read by optical character recognition); the SRA's guidance Making decisions to investigate concerns and How we gather evidence in our regulatory and disciplinary investigations; the SRA's page Reporting a solicitor or firm to us as updated on the 11th of September 2026; the SRA's Investigations and enforcement annual data 2023/24; the SRA Board papers SRA Corporate Complaints November 2023 to October 2024 (30 June 2025) with the Independent Reviewer's annual report annexed, the July to October

2025 performance report (27 January 2026) and the November 2025 to February 2026 performance report (21 April 2026); the SRA's performance targets to meet the SSB conditions (12 March 2026); the two Carson McDowell reviews for the LSB (October 2024 and October 2025); the Jenner & Block serious event review of PM Law (September 2026); the LSB's decision notice of the 5th of March 2026 and its news releases of the 16th of October 2025, the 5th of March 2026 and the 3rd of September 2026; the SRA's press release of the 16th of October 2025; the Ministry of Justice's Independent Public Bodies Review of the Legal Services Board (July 2026); and the Berkeley Partnership independent assurance review published by the SRA (3 September 2026). Further public documents opened for this draft: the SRA Board paper SRA Corporate Complaints November 2022 to October 2023 (9 July 2024); the Independent Reviewer's report for the year to October 2022; the SRA's case studies about reporting a solicitor (23 May 2024); SRA published decision, HSR Law Limited (25 June 2025); the judgments in Mazur [2025] EWHC 2341 (KB) and [2026] EWCA Civ 369, Travelers v Baldwin [2025] EWHC 2957 (KB), Hinkel v Gheissari [2025] EWCA Civ 1351, Perseus Ventures v Foskett [2026] EWHC 2008 (KB) and El Diwany [2023] EWCA Civ 888, read from Find Case Law; SDT judgments in Kearney (12750-2025), Ilyas (12822-2025), Heer (12499-2023), Chouhan (12457-2023), Crosby (12658-2024) and Clapton (12873-2025), read in full from the Tribunal's website on the 16th of September 2026 (Kearney and Clapton are scanned and were read by optical character recognition, checked against the page images), with Legal Futures reports of 11 November 2025, 21 February 2025 and 18 May 2026; SRA responses to requesters published on WhatDoTheyKnow (24 February 2017, 1 and 14 August 2019, 1 July 2020, 1 July 2026); and the client notes and service pages of Saunders Law (4 August 2026, 27 March 2025), Brett Wilson LLP, Kingsley Napley, Regulatory Defence Ltd and JMW Solicitors, opened on the 16th of September 2026. Private documents: the SRA's letter to Blind Justice of the 26th of June 2026; five SRA assessment-stage decisions dated 2025 and 2026; and the SRA's service complaint response and covering email concerning Decision D, 2026. The Trustpilot page was read on the 15th of September 2026 and its contents are unverified.

Public material was also read that does not point the same way, and it is recorded here. Three recent judgments record later outcomes consistent with an SRA decision not to act: Travelers Insurance v Baldwin [2025] EWHC 2957 (KB), where the court quoted the SRA's closure reasoning and granted an injunction against the reporter; Hinkel v Gheissari [2025] EWCA Civ 1351, where four successive reports were closed between 2018 and 2021 and the Tribunal and the SRA found no evidence of dishonesty and the Court of Appeal dismissed his appeal; and Perseus Ventures v Foskett [2026] EWHC 2008 (KB), where a report the SRA declined to investigate formed part of conduct the court restrained. None of the three reviewed the SRA's assessment; each shows only that a closure and a later outcome can coincide. Two judicial review attempts against SRA decisions not to investigate, both by one litigant, were certified totally without merit ([2023] EWCA Civ 888 at [21] to [22]). The Independent Reviewer found no service failing in 87 per cent of its reports in 2023/24, a figure that concerns complaints handling and not the correctness of decisions, which the Reviewer has no power to examine. This briefing does not claim that assessment closures are wrong as a class. It claims that the method by which they are reached is the one described above, in the SRA's own words and in those of its reviewers and the courts.

The five decisions were coded by one reader against the frame in the annex and the coding was checked against the letters a second time before this draft was settled. The count of concerns follows the numbering in each letter. Where a letter is ambiguous the coding is noted as such in the annex rather than resolved in the briefing's favour. The briefing reports only what each letter records.

The five decisions are held in full. Blind Justice will make them available, in confidence and on the terms set out in the summary, to journalists, to the Legal Services Board and to any parliamentary committee that asks, so that nothing in this briefing has to be taken on trust. Requests should go to info@blindjustice.org.uk. The SRA holds the originals. In addition to the five decision letters, Blind Justice holds more than twenty items of SRA decisions and correspondence from 2025 and 2026, including the SRA's own responses to the charity, all available for inspection on the same terms. Blind Justice also searched the public record for published assessment-stage closure letters, across WhatDoTheyKnow, Find Case Law, BAILII, the consumer and legal forums, the legal press and parliamentary material, and found

none published in full; the only verbatim extracts are those quoted in judgments. Where a quotation from a private decision or correspondence contains identifying information, square brackets indicate redaction or the substitution of a neutral descriptor; no substantive meaning has been changed.

Public sources, linked

The following public documents can be opened directly. Private documents are held by Blind Justice and available on the terms above.

Mazur v Chartered Institute of Legal Executives [2026] EWCA Civ 369 <https://caselaw.nationalarchives.gov.uk/ewca/civ/2026/369>

Mazur v Charles Russell Speechlys [2025] EWHC 2341 (KB) <https://caselaw.nationalarchives.gov.uk/ewhc/kb/2025/2341>

Travelers v Baldwin [2025] EWHC 2957 (KB) <https://caselaw.nationalarchives.gov.uk/ewhc/kb/2025/2957>

Hinkel v Gheissari [2025] EWCA Civ 1351 <https://caselaw.nationalarchives.gov.uk/ewca/civ/2025/1351>

Perseus Ventures v Foskett [2026] EWHC 2008 (KB) <https://caselaw.nationalarchives.gov.uk/ewhc/kb/2026/2008>

El Diwany [2023] EWCA Civ 888 <https://caselaw.nationalarchives.gov.uk/ewca/civ/2023/888>

SDT, Kearney, 12750-2025 <https://solicitortribunal.org.uk/wp-content/uploads/2025/06/12750-2025-Kearney-Final.pdf>

SDT, Ilyas, 12822-2025 https://solicitortribunal.org.uk/wp-content/uploads/2025/11/12822.2025.Ilyas_.pdf

SDT, Heer, 12499-2023 https://solicitortribunal.org.uk/wp-content/uploads/2023/10/12499-2023.Heer_.pdf

SDT, Chouhan, 12457-2023 <https://solicitortribunal.org.uk/wp-content/uploads/2023/10/12457.2023.Chouhan.pdf>

SDT, Crosby, 12658-2024 <https://solicitortribunal.org.uk/wp-content/uploads/2024/09/12658.2024.Crosby.pdf>

SDT, Clapton, 12873-2025 <https://solicitortribunal.org.uk/wp-content/uploads/2026/03/12873-2025-Clapton-1.pdf>

Carson McDowell, Independent Review, Axiom Ince (LSB, 29 October 2024) <https://legalservicesboard.org.uk/wp-content/uploads/2024/10/Independent-Review-of-the-Regulatory-Events-Leading-up-to-the-SRAs-Intervention-into-Axiom-Ince-Lim.pdf>

Justice Committee, oral evidence from the LSB and SRA, 14 April 2026 <https://committees.parliament.uk/oralevidence/17463/html/>

SRA, Upholding Professional Standards 2019/20 (22 July 2021) <https://www.sra.org.uk/sra/how-we-work/reports/upholding-professional-standards-2019-20/>

SRA, Upholding Professional Standards 2020/21 (23 June 2022) <https://www.sra.org.uk/sra/research-publications/upholding-professional-standards-202021/>

SRA, Upholding Professional Standards 2021/22 (July 2023) <https://www.sra.org.uk/sra/research-publications/upholding-professional-standards-2021-22/>

SRA, Upholding Professional Standards 2022/23 (20 December 2024) <https://www.sra.org.uk/sra/research-publications/upholding-professional-standards-2022-23/>

SRA, Investigations and enforcement annual report 2023/24 (2 February 2026) <https://www.sra.org.uk/sra/research-publications/investigations-enforcement-annual-data-2023-24/>

SRA, Case studies about reporting a solicitor (23 May 2024) <https://www.sra.org.uk/consumers/problems/report-solicitor/case-studies-reporting-solicitor/>

SRA, Making decisions to investigate concerns <https://www.sra.org.uk/solicitors/guidance/investigations-decisions-investigate-concerns/>

SRA, How we gather evidence in our regulatory and disciplinary investigations (25 November 2019) <https://www.sra.org.uk/solicitors/guidance/investigations-gathering-evidence/>

SRA, Topic guide: competence and standard of service <https://www.sra.org.uk/sra/corporate-strategy/sra-enforcement-strategy/enforcement-practice/competence-standard-service/>

Solicitors Disciplinary Tribunal, published judgments (the corpus) <https://solicitortribunal.org.uk/>

Links to the SRA guidance pages, Board papers, performance reports, the SSB and PM Law reviews, the LSB decision notice and the WhatDoTheyKnow responses will be added to the publication version once each has been re-opened and its address confirmed.

SEND US YOUR SRA LETTER

If the SRA told you it would not investigate your report about a solicitor or a law firm, Blind Justice would like to see the letter. Every name is removed, you approve the wording before anything is used, and nothing is forwarded to anyone. Send it to info@blindjustice.org.uk with LETTER in the subject line.

Annex: coding frame and concern-by-concern coding

Source of the closing fact: R, the reporter's material; F, the firm's or solicitor's explanation, confirmation or document; I, the SRA's own records; X, an independent document or third party; O, the officer's own supposition. E, the letter engages with the reporter's evidence on the page. Q, the letter records an enquiry of the regulated person. V, the letter records independent verification of the regulated person's account against a source outside that person. D, the concern is deferred to a court or other body. B, the burden is returned to the reporter.

Dec .	Concern	Source	E	Q	V	D	B	Closing words
A	1 Conflict of interest	F	No	Yes	No	Yes	No	'The firm has confirmed that there is no basis in which its interest ... are conflicted'
A	2 Defamatory statements	R	Yes	No	No	Yes	Yes	'no evidence provided'; 'nothing to indicate ... a pattern'
A	3 Subject access request	I	No	No	n/a	Yes (ICO)	No	Referred to the ICO
A	4 Collusion	R + F	Yes	Yes	No	No	Yes	'states that he has not colluded ... not capable of proof'
A	5 Procedural conduct	None	No	No	n/a	Yes	No	Matter for the court
A	6 Inaccurate order sent to court	F	No	Yes	No	Yes	No	'The firm confirms that no inaccurate Court Order was ever submitted'
A	7 False representations	None	No	No	n/a	Yes	No	Matter for the court
A	8 Correspondence after strike-out	F (document)	No	Yes	No	No	No	'The firm has confirmed and provided evidence'
B	1 Service	None	No	No	n/a	Yes (LeO)	No	Referred to the Legal Ombudsman
B	2 Collusion	R + F	Yes	Yes	No	No	Yes	Reporter's emails quoted; 'not capable of proof'
B	3 Subject access request	I	No	No	n/a	Yes (ICO)	No	Referred to the ICO
C	1 Public description of professional status	O + I	Yes	No	No	No	Yes	'We consider it likely this was an inadvertent oversight ... we invite [the reporter] to provide this'
D	1 (same concern, after challenge)	F	Yes	Yes	No	No	No	'Given the explanation provided ... no further investigation is required'; SRA later confirmed 'we did not seek further evidence'
E	1 Case conducted without solicitor supervision	F (document recorded as amended)	No	Yes	No	Yes	No	'not the original letter ... However, its contents confirm'

Fair coding notes. Engaging with the reporter's evidence (E) and asking the regulated person (Q) are both recorded as what they are; neither is verification (V), which is a check against a source outside the regulated person, and no such check is recorded anywhere in the five decisions. A8 is the only concern in Decision A where a document is recorded; it was supplied by the firm and its nature is not stated. E1 names the document relied on, a client care letter supplied by the firm, and records that it was amended. B2 is the one concern where the reporter's own evidence is quoted and assessed at length on the page; E is marked for A2 and A4 where the letter refers to the reporter's material without assessing it. E1 is coded D because the letter treats the absence of adverse judicial findings as a reason for closure; that is a deferral to the court's record rather than to a pending decision, and is noted as such. C and D concern the same report. D is counted separately in section 8 because it is a separate decision, issued after an express challenge on verification.

Blind Justice UK, Registered Charity No. 1217562. Research briefing, September 2026. Evidence file. Published 17 September 2026. The SDT dataset (67 cases) and the worked-example coding are held as spreadsheets and will be published with the briefing. Consents for use of all five decisions obtained as at the 16th of September 2026.