



# Blind Justice

## INVESTIGATION REPORT

# THE COMPLAINTS LEDGER

The SRA withheld firm level complaints data from consumers, and sent them instead to a record where every decision expires after twelve months

The regulator has held a complaints record for every law firm in England and Wales since 2012. It has never shown it to the public. In 2018 it promised consumers something else instead. We tested that promise on the 151 firms with the longest complaints histories we could find. More often than not, it leads nowhere.

## Blind Justice UK

Registered Charity No. 1217562

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**RIGHT OF REPLY.** This report was sent in full to the Solicitors Regulation Authority and to the Legal Ombudsman on the day it was published, together with the questions put to each of them. Blind Justice UK undertakes to publish any reply from either body in full and without editing, alongside this report and the right of reply letters themselves.

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## Four numbers

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**289,000**

first tier complaints recorded in the Solicitors Regulation Authority's own published series between 2013 and 2023. Not one of them is attributable, in anything the SRA publishes, to a named firm.

**73 of 131**

firms whose SRA register page tells a consumer to search the Legal Ombudsman for that firm's complaints record, where the search returns nothing at all.

**94.5 per cent**

of the firms once named in the Ombudsman's published decision data, 5,382 out of 5,698, absent from the record a consumer can search today.

**20 of 20**

firms in our sample that have closed, been revoked, ceased or been intervened in, whose register pages carry no complaints information and no route to the Ombudsman whatsoever.

**This is not a missing data problem. It is the consumer information system the regulators built.**

# Overview

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Ask one question of it and the whole arrangement comes into focus.

**You are about to instruct a law firm with the proceeds of your house sale. What does the regulator let you know about that firm's complaints history?**

**In circumstances where a complaints history exists, the answer can still be nothing.**

This is not because the information does not exist. Every year, when a law firm renews its practising certificate, the Solicitors Regulation Authority asks it how many complaints it received from its own clients, how many it resolved, and what those complaints were about. Every firm answers. The regulator has been collecting these answers since 2012. It holds a complaints ledger for the entire profession.

It has never published it at firm level, and in June 2018 it decided formally that it would not.

The SRA's own research, quoted in the document recording that decision, found that **91 per cent of users of legal services say that having access to firms' complaints data would be helpful to them.**

The reason given for withholding it was that the SRA does not check the figures:

*We know that consumers expect data published on the websites of regulators to be accurate and robust. We do not undertake any verification of the complaints data we collect and it would require a great amount of resource for us to do so. However, without that verification, we do not feel able to publish the data knowing that consumers will rely on it.*

Three paragraphs later in the same document, the SRA committed to going on using that same data itself, firm by firm:

*We will monitor complaints data at an individual firm level. Where we have concerns about an individual firm, for example, if we see a pattern of increased complaints, we may engage to explore the issue further.*

**The data is good enough to regulate on. It is not good enough to show.**

## The promise

Having decided not to publish, the SRA did not leave consumers with nothing. It promised them an alternative, in the same document, at paragraph 91:

*To support consumers in making a purchasing decision, we will use our digital register to signpost consumers to the LeO complaints and Ombudsman's decisions data.*

That promise was kept. Go to the SRA register today, look up a firm, and near the bottom of the page you will find a panel headed '**This firm's service complaints record**'. It tells you the Legal Ombudsman publishes its decisions and invites you to search for the firm in the Legal Ombudsman Data Centre.

**The Legal Ombudsman deletes each published decision after twelve months.**

It has done so since it began publishing. We dated the rule from the Ombudsman's own guidance page as it stood on 26 September 2012, where it is given in a single line:

*How often is the data updated? Every three months. We'll keep the information for each case on the page for a year.*

So the rule was **five years and nine months old** when the SRA chose that record as the substitute for its own. It was not a rule that came in afterwards and spoiled a reasonable plan. It was the standing, published, publicly available practice of the body the SRA pointed at, and it meant the destination could never hold a firm's history. It could only ever hold the last twelve months of it.

## The timeline

| Date           | What happened                                                                                                                                                                                                                  |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| September 2012 | The Legal Ombudsman's published guidance states that decision information is kept on the page for one year.                                                                                                                    |
| October 2014   | The Ombudsman's published file holds 2,895 decisions, every one of them from a single rolling twelve month period. The rule is operating in practice.                                                                          |
| June 2018      | The SRA decides not to publish first tier complaints data at firm level, and promises to signpost consumers to the Ombudsman's decision data instead.                                                                          |
| 2019           | The SRA digital register launches. The signpost is implemented as promised.                                                                                                                                                    |
| October 2025   | The SRA considers publishing firm level complaints information again, and decides to explore 'how and whether' at a later date.                                                                                                |
| January 2026   | The Legal Services Board declines to accept the SRA's proposed complaints rule changes in their current form. The SRA withdraws them.                                                                                          |
| June 2026      | The Ombudsman consults on publishing decisions in full, describing its current data as giving an 'incomplete picture' that can play 'only a limited role' in consumer choice. It proposes nothing about the twelve month rule. |
| July 2026      | The SRA opens a supplementary consultation on first tier complaints, closing 1 September 2026. On publishing complaints data it says its position is 'unchanged and we still intend to proceed as planned'.                    |
| August 2026    | Blind Justice tests the signpost on the 151 firms with the longest published complaints histories. On 73 of the 131 that carry it, the search returns nothing.                                                                 |

No explanation is required of that sequence. It requires only a question, and it is the question this report puts to the SRA and asks the public to hold it to.

## The question the SRA has never been asked

**Which document records that the twelve month deletion rule was considered before the SRA chose the Ombudsman's data as the substitute for publishing its own?**

Not whether somebody happened to know. Whether it was assessed. The SRA did not adopt this route casually: it ran a consumer trial using the Ombudsman's decision data and reported that people used it and generally made good decisions on it. It examined the dataset. The question is whether anybody examined how long the dataset lasts.

If such an assessment exists, it should be published. If it does not exist, then the regulator built the public's only route to a firm's complaints history on a record whose expiry date it had never looked at.

We have put that question to the SRA in those terms. It is question two of eleven, and it is the one that matters.

## **And when a firm fails, it gets worse**

Every firm in our sample that has closed, been revoked, ceased trading or been intervened in by the SRA has no complaints panel on its register page at all. No signpost, no mention of the Ombudsman, no link. Twenty firms out of twenty, without exception.

Ross Coates Solicitors of Ipswich was closed down by the SRA on 28 April 2026. Its register page says so in terms: **'We have closed this firm down to protect the public.'** It appears in eight of the ten archived Ombudsman captures we hold. There is nothing on its page about service complaints, and no route to the body that handles them.

**The worse the failure, the less the consumer can see.**

# 1. The ledger

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## What the regulator holds

The SRA regulates approximately 25,000 organisations. Every year it collects first tier complaints information from the firms it authorises through the practising certificate renewal exercise. A first tier complaint is one made by a client directly to the firm. The firm has eight weeks to give its final written response. If the client remains dissatisfied, the next step is the Legal Ombudsman.

What the SRA holds is not a headcount. Its own published analysis shows that for each reporting year it has the number of complaints received, the number resolved, and a breakdown by category using the same taxonomy the Ombudsman uses: delay, failure to keep informed, failure to progress, failure to advise, costs excessive, costs information deficient, failure to follow instructions, failure to keep papers safe, data protection and breach of confidentiality, discrimination, criminal activity, conduct, failure to investigate a complaint internally, failure to comply with an agreed remedy, and other.

It can break that down by firm size and by turnover band, which means it holds it firm by firm before it aggregates anything at all.

## What the public gets

The totals. The most recent report is the First Tier Complaints Report 2023, published on 23 May 2024.

| Year | Complaints received | Complaints resolved | Resolved |
|------|---------------------|---------------------|----------|
| 2013 | 25,689              | 18,272              | 71%      |
| 2014 | 27,900              | 20,265              | 73%      |
| 2015 | 27,729              | 21,771              | 78%      |
| 2016 | 27,672              | 21,964              | 79%      |
| 2017 | 28,460              | 22,305              | 78%      |
| 2018 | 28,254              | 22,847              | 81%      |
| 2019 | 30,836              | 24,776              | 80%      |
| 2020 | no data available   | no data available   | no data  |
| 2021 | 22,964              | 18,025              | 78%      |
| 2022 | 33,715              | 27,354              | 81%      |
| 2023 | 36,887              | 29,835              | 81%      |

**Around 289,000 complaints. Not one attributable to a named firm.**

In 2023 the gap between complaints received and complaints resolved was **7,052**. Those are complaints that the firm itself did not resolve to the client's satisfaction. How many reached the Ombudsman is not published and we do not estimate it. What can be said is the order of magnitude. The Ombudsman's entire current published decision file, which is the whole of what the SRA's signpost can reach, contains **887 decisions across 642 firms**.

The pressure on the second tier is in the SRA's own current consultation document, published in July 2026. The Ombudsman found complaints handling had been poor in **46 per cent** of the complaints it investigated in the first three quarters of 2025/26. Demand rose almost 30 per cent year on year, and the Ombudsman forecasts **17,675 new complaints in 2026/27, a 174 per cent increase since 2019/20**.

Set that beside the record a consumer can search: 887 decisions across 642 firms.

The series answers the question 'are complaints about solicitors rising'. It answers it well. It cannot answer 'has this firm had complaints', which is the only question a person choosing a solicitor is actually asking.

## Good enough to regulate on

There is one row in that table worth pausing on. For 2020 the SRA published nothing, and its explanation is its own:

*due to technical issues which impacted the quality of data available, we were not able to publish any information relating to 2020*

A regulator that will not publish a dataset because it cannot vouch for its accuracy, and which in one year could not publish it at all because of data quality, is making a point about that dataset that this report takes seriously.

But the same regulator uses it. Paragraph 93 of the 2018 position paper commits the SRA to monitoring complaints data at individual firm level and engaging with a firm where it sees a pattern of increased complaints. That is a regulatory judgement, about a specific firm, made on this data.

So the position is not that the data is worthless. The position is that it is sound enough to found regulatory attention on a named firm, and not sound enough to be shown, with caveats, to that firm's clients.

**We have asked the SRA to explain that distinction, and how many firms have been engaged with under paragraph 93 since 2018.**

## 2. June 2018: the decision, and the promise

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### What was proposed

The SRA's transparency programme ran from a discussion paper in October 2016 through consultation to a post consultation position published in June 2018. It was driven along by the Competition and Markets Authority's legal services market study of December 2016, which found the market was not working well for consumers because they could not compare providers.

Publication of the first tier complaints data was one of the proposals. Paragraph 81 of the position paper:

*We collect information about first tier complaints from firms every year through our annual practising certificate renewals. We do not currently publish this information. We proposed in our consultation that we would publish this data on our website (not within the register). We suggested that this data could be used by third parties such as comparison websites and could be a helpful indicator of quality to consumers if appropriate context was provided.*

### What was decided

Paragraph 85:

*At the moment, we will not proceed with the publication of first tier complaints information.*

Paragraph 15 of the same document lists it among the changes made after consultation, in five words: **'Moving away from plans to publish first tier complaints data.'**

### The defence, in the SRA's own words

The SRA gives four reasons and this report sets out all of them, because they are not frivolous and because a reader should be able to weigh them.

**One. The behavioural risk.** Respondents said publication would change how firms treat complaints:

*Some respondents were also concerned that publishing complaints data would distort the behaviour of some firms and their employees when it came to reporting complaints. This could lead to complaints being hidden, even from the management of firms, hampering a firm's efforts to learn from complaints and improve customer service.*

This is a real argument. A measure that is published becomes a target, and if firms stopped recording complaints as complaints, the SRA's data would be the first casualty.

**Two. The data would not discriminate between firms:**

*if we categorise firms by low, medium and high levels of complaints received, 99 percent of firms would fall within the low category. This data alone would therefore not help consumers differentiate between providers.*

**Three. Contextualising it properly**, for example against the number of transactions a firm handles, would mean collecting more information and adding to the burden on firms.

**Four. Verification**, which is the reason that has lasted:

*We do not undertake any verification of the complaints data we collect and it would require a great amount of resource for us to do so. However, without that verification, we do not feel able to publish the data knowing that consumers will rely on it. We have considered whether we could publish the data with appropriate caveats, but we are concerned that many consumers would not read the caveats and would assume the data had been verified by us.*

On the other side of the argument, the Legal Services Consumer Panel and the Legal Ombudsman itself supported publication.

## **The answer to the defence**

Take the four reasons at their highest. Suppose all of them are right. **They are reasons not to publish a particular dataset. None of them is a reason to leave the consumer with nothing.**

The SRA understood that, which is why it did not stop at paragraph 85. It went on to promise a substitute, and the substitute is what this report is about. Paragraph 91:

*Therefore, having carefully weighed up the advantages of publishing this data against the risks and issues associated with doing so, we have reluctantly concluded that we will not proceed to publish first tier complaints data at this time. However, we recognise that information about complaints is important to users of legal services. To support consumers in making a purchasing decision, we will use our digital register to signpost consumers to the LeO complaints and Ombudsman's decisions data.*

And it told the reader why it had confidence in that substitute:

*In our consumer trial testing LeO's Ombudsman's decisions data, we found that people used and generally made 'good' decisions based on the data. The trial was designed so that in each situation where a participant had to choose a provider, there was a 'best' option based on the number of Ombudsman's decisions and remedies awarded.*

**The SRA did not fall back on the Ombudsman's data casually. It tested it. It found consumers could use it. It built the public's only route to a firm's complaints history on it.**

What it does not say, anywhere in the document, is how long that data lasts.

### 3. The record it chose

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#### One year, from the beginning

The Legal Ombudsman began publishing decision data in 2012, after a consultation in 2010 and a policy decision in 2011. Its policy statement sets out two categories. Category 1 names a provider and publishes the case in full where there is a pattern of complaints or circumstances that make naming in the public interest. Category 2 is the routine record: the name of every provider that has had an ombudsman final decision, the number of decisions, the date, the area of law, the remedy, the complaint type, whether there was evidence of poor service, and whether the firm's own complaint handling was reasonable.

Then this:

*Decisions will stay on the website for one year from the date they are published.*

The current data page puts it in current words: 'Each decision remains published for 12 months from the date of publication.'

#### Dated from the source

Because the date of that rule decides how this report reads, we did not assume it. The Ombudsman's own guidance page for the decision data, as archived on **26 September 2012**, answers the question directly:

*How often is the data updated? Every three months. We'll keep the information for each case on the page for a year.*

And it was operating in practice long before 2018. The earliest complete decision file we hold, captured on **26 October 2014**, contains 2,895 decisions across 1,841 firms, and every one of them falls in the four quarters from the second quarter of 2013 to the first quarter of 2014. A rolling window of exactly one year, three and a half years before the SRA's decision.

## 5 years, 9 months

the age of the Legal Ombudsman's one year deletion rule when the SRA chose that record as the substitute for publishing its own complaints data.

#### Why this is the centre of the report

There are two possible stories about the 2018 undertaking and only one of them is true.

The first is that the SRA chose a sound alternative which later degraded. That story would be a story about drift, and it would not be worth publishing.

The second is that the SRA chose an alternative that was **structurally incapable, on the day it was chosen**, of showing a consumer a firm's complaints history. Not because of any failing by the Ombudsman, which has always said openly what it does. Because a record that drops each decision after twelve months is not a history, and a regulator directing consumers to it as the answer to 'has this firm had complaints' was directing them to something that could never answer the question.

The dates say it is the second.

## The paper trail

This report does not assert that any individual at the SRA knew of the rule and disregarded it. It does not have to. The rule was published, it was on the Ombudsman's own guidance page, and the SRA had examined the dataset closely enough to run a consumer trial on it.

What the report asks for is the assessment. In our letter to the SRA the question is put in these terms:

*Please identify the document, assessment, meeting paper or consumer testing material in which the twelve month deletion rule was considered before the SRA decided to rely on Legal Ombudsman data as the substitute for publication of firm level complaints information. If no such assessment exists, please confirm that.*

There are only two possible answers and both of them are answers. Either the document exists, and the public is entitled to see what was concluded. Or it does not, and a regulator that would not publish its own data because it might be inaccurate sent the public to a record it had not checked the shelf life of.

## In fairness: the material is not destroyed

The Ombudsman's policy statement adds a route which must be reported:

*Please note that information relating to decisions that were made more than 12 months ago can be requested under the Freedom of Information Act 2000.*

The older records exist and can be obtained. A consumer who knows the Freedom of Information Act applies to the Office for Legal Complaints, who makes a request in writing, and who is willing to wait up to twenty working days, can get what the website no longer shows.

**That is a real answer and it is not an answer to this.** The SRA's undertaking was to support consumers 'in making a purchasing decision'. Nobody exchanges contracts at the pace of a statutory information request.

## Even the public interest cases expire

The Ombudsman's Category 1 power is its strongest. It names a provider and publishes the case in full where there is evidence of systemic failure affecting a substantial number of consumers, exceptional or severe impact on an individual or group, very serious service failure, or a significant lack of cooperation with the Ombudsman.

Twenty seven such decisions have been published. They are removed after twelve months as well.

## 4. The test

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### What is actually on the page

The SRA's digital register launched in 2019. Every regulated organisation has a page. It carries contact details, offices, areas of law, reserved activities, the SRA regulated people who work there, and a regulatory record.

It also carries the 2018 promise, under the heading '**This firm's service complaints record**':

*The Legal Ombudsman, a separate organisation from the Solicitors Regulation Authority, investigates complaints about the service consumers have received from their legal services provider and works to resolve the situation. Examples of poor service include being slow to act and costs not being clear or changing.*

*The Legal Ombudsman publishes its decisions about service complaints. You can search for this firm in the Legal Ombudsman Data Centre.*

The last phrase is a link and it goes to the Ombudsman's search.

### How we built the hardest possible test

We hold eleven files of the Ombudsman's published decision data: ten captures taken from the UK Government Web Archive between June 2015 and May 2020, and the current live file. From them we took every firm appearing in **eight or more of the ten archived captures**.

These are the firms with the most persistent published complaints records in the entire archive. A firm in eight captures had ombudsman decisions published against it across a span of years, not once. If the signpost works anywhere, it works here.

That is 207 names. We resolved them to the register using the SRA's own data interface. **151 resolved to exactly one organisation** and were audited. The other 56 were set aside. The method is in the back of this report.

### Every page exists

All 151 firms have a page on the register. Not one search failed. The register itself is populated and it works.

### The regulator's own record is blank

**141 of 151**

register pages that state: 'There are no disciplinary or regulatory decisions currently published about this firm.'

Disciplinary decisions and service complaints are different things and the SRA has never claimed otherwise. This is not a criticism of the SRA's disciplinary record. It matters for one reason only: **it means the complaints panel is carrying the entire weight**. On 141 of these pages there is nothing else. Whatever the consumer learns, they learn by following the signpost.

## So we followed it

The Ombudsman's search takes a provider name and returns the number of firms and decisions found. We put all 151 firm names through it, using the name exactly as the Ombudsman itself published it in its own files, which is the most favourable form available to each firm.

**73 of 131**

firms whose SRA page tells the consumer to search the Data Centre, where that search returns zero firms and zero decisions.

**Fifty six per cent.** More than half of the signposts, on the pages of the firms with the longest published complaints histories in the country, lead to an empty result.

Across all 151 firms the search returns a record for 64 and nothing for 87.

This is the search itself, not a model of it. We derived the same figure independently from the published downloadable file as a cross check. Both methods give 73.

## The hardest subgroup

Forty two of the audited firms appear in **all ten** archived captures, meaning the Ombudsman published decisions against them in every window we hold across five years. Thirty six of the 42 carry the signpost.

**22 of 42**

firms with an unbroken five year published complaints record in our archive, for which the Ombudsman search returns nothing today.

## What this is not

A word about the firms, because they are real and most of them are trading normally and none of them is the subject of this report.

An ombudsman decision is not a finding of professional misconduct, and it is frequently not a finding of poor service at all. The Ombudsman's own June 2026 consultation states that around 30 to 40 per cent of ombudsman decisions result in a finding of no poor service. The numbers per firm are small, typically two to four in any single window. Nothing in this report is a criticism of any firm named in it.

The subject is the regulator's route, not the firms at the end of it.

# 5. When a firm closes, its complaints history goes with it

The most serious step the SRA can take against a firm is to intervene: to close the practice and take possession of the files and the money. The second most serious is to revoke its authorisation.

Every firm in our sample that has been through any of that has no complaints signpost at all.

| Status on the register   | Firms in sample | Complaints panel present |
|--------------------------|-----------------|--------------------------|
| Authorised               | 131             | 131                      |
| Revoked                  | 7               | 0                        |
| Ceased                   | 3               | 0                        |
| Intervened in            | 2               | 0                        |
| Not itself SRA regulated | 8               | 0                        |

Twenty out of twenty. No panel, no mention of the Legal Ombudsman, no link, nothing.

## Ross Coates Solicitors

Ross Coates Solicitors of Ipswich was intervened in by the SRA on 28 April 2026.

The register page does not hide it. Under the firm's name it reads '**Closed down by the SRA**', and beneath that, '**We have closed this firm down to protect the public. Learn more about the regulatory record below.**' The regulatory record then sets out the intervention decision, the date, and the statutory grounds under Schedule 2 to the Administration of Justice Act 1985, including that it was necessary to intervene to protect the interests of clients or former clients.

Ross Coates Solicitors appears in eight of the ten archived Ombudsman decision captures we hold.

**And it is in the Ombudsman's record today.** Decision D011936, dated 9 October 2025, residential conveyancing, a remedy required, compensation in the £1,000 to £4,999 band, and the evidence of poor service field marked yes. Run the search the signpost would have pointed to and it returns one firm and one decision. The record is there, now, six months before the regulator closed the firm down.

On that page there is nothing at all about service complaints. No panel. No Ombudsman. No link.

**So this is not a case of an expired record.** The Ombudsman is publishing a poor service finding about this firm at the moment you read its register page, and the register page withholds the route to it. The twelve month rule is not the explanation here. The page is.

**The person most likely to be reading that page is a former client of a firm the regulator has just closed down to protect them.** They are given the intervention notice and no route to the body that handles complaints about the service they received.

## Why it happens

The reason is in how the page is assembled, and it appears to be an accident rather than a decision. The complaints panel is not part of the page template; it is written in by a script, and that script sits inside the panel headed 'Legal services at this firm', the one listing areas of law and reserved activities. A firm that has closed does not offer legal services, so its page does not carry that panel. No panel, no script, no complaints information.

In our sample the correlation is exact and has no exceptions: all 131 pages with the legal services panel carry the complaints panel, and all 20 without it have neither.

So a consumer's access to a firm's complaints record is attached to the description of what that firm currently sells. When the firm stops selling anything, the complaints signpost goes with it.

Nothing in the SRA's published material says closed firms should be treated differently, and we do not suggest this was intended. **It could be fixed in an afternoon.** It is the first question we have put to the SRA.

**The worse the failure, the less the consumer can see.**

## 6. The scale of the disappearance

Blind Justice has published on the removal of Ombudsman decisions before and this report does not restate that work. Our earlier audit established that **11,448 previously published decision entries** were no longer present in the live record at the point it was taken. That figure stands on its own method.

What the archive adds here is the firm level view of what a consumer can reach.

| Capture                          | Decisions | Firms |
|----------------------------------|-----------|-------|
| 26 October 2014                  | 2,895     | 1,841 |
| June 2015                        | 2,996     | 1,834 |
| 22 October 2015                  | 2,850     | 1,817 |
| 1 March 2016                     | 2,627     | 1,751 |
| 31 May 2017                      | 2,494     | 1,635 |
| 20 November 2017                 | 2,262     | 1,513 |
| 18 May 2018                      | 1,949     | 1,328 |
| 22 May 2019                      | 2,419     | 1,554 |
| 17 September 2019                | 2,479     | 1,582 |
| 14 February 2020                 | 1,654     | 1,153 |
| 15 May 2020                      | 1,806     | 1,207 |
| Current file, 2025/26 to 2026/27 | 887       | 642   |

These are rolling twelve month windows and consecutive captures overlap, so they must never be summed. Counted as distinct firm names across the ten archived captures:

**5,382**

firms, out of 5,698 once named in the Ombudsman's published data, absent from the record a consumer can search today. **94.5 per cent.**

Name matching across a decade is crude, so it was tested. Stripping corporate suffixes, punctuation and connectives gives 5,222 archived names against 639 live and 93.0 per cent absent. The finding moves by a point and a half and holds.

### What it does and does not mean

It does not mean records were improperly deleted. The Ombudsman says openly what it does and does what it says. A firm absent from the current file may simply have had no decision in the last year, which is the outcome everybody wants, or may have closed, merged or changed its name.

**What it means is this, and it is enough.** For 5,382 firms that were once publicly listed as having had an ombudsman decision, the route the regulator provides returns nothing today.

## 7. The circle

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Set the two positions side by side.

| Body            | Holds                                                                   | Will not publish because                                                                                          | Points to                                                                    |
|-----------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------|
| SRA             | First tier complaints for every firm it authorises, annually since 2012 | It does not verify the data and consumers would assume it had                                                     | The Legal Ombudsman's published decisions                                    |
| Legal Ombudsman | Every ombudsman final decision                                          | Material not published has not been through its checks, and auditing more is not a proportionate use of resources | A twelve month window, and the Freedom of Information Act for anything older |

Each body's reason for withholding is the other body's reason for being the destination. The SRA sends consumers to the Ombudsman because the Ombudsman's material is checked. The Ombudsman keeps the published set small and short lived because checking is expensive. **The smallness of the checked set is precisely why the signpost fails.**

The Ombudsman's own words on this, from its guidance page of 2012, are worth reading next to paragraph 90 of the SRA's position paper:

*Our information is rigorously checked and our detailed reports are checked and verified by internal auditors and our Board. Any complaints information that isn't published here has not been through these rigorous checks. We don't think it's an appropriate use of our resources to audit additional information in this way, so won't be able to supply unaudited information in response to individual enquiries.*

Two public bodies. The same reason. Opposite directions. Neither is concealing anything: every element of this is in published documents. It is the combination that has never been examined, because the two halves sit in different organisations and each half looks reasonable on its own.

The person standing in the gap is the one about to hand over the proceeds of a house sale.

## 8. October 2025: the same decision again

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On 30 May 2025 the SRA opened a consultation called **Changing our requirements on first-tier complaints**. Among the questions were three about publication: what are your views on the SRA collecting and publishing timeliness data at firm level, what context would be needed to make it useful to consumers and fair to firms, and what information about complaints would be most helpful to consumers.

It published its response on **14 October 2025**, and 2018 repeated itself almost exactly.

The profession objected: the risk of misleading impressions without adequate context and the difficulty of providing that context, a disproportionate burden on firms, increased compliance costs passed to consumers, doubts about the value to consumers, and the risk of firms rushing responses to hit a target instead of answering properly.

Some firms supported collection but not publication at firm level. The Legal Services Consumer Panel supported both.

Consumers engaged by the SRA were supportive of published complaints data if it was reliable. One of them, on the SRA's own account, drew a contrast with 'unverified' reviews on websites.

The decision:

*We will start to collect timeliness data about how long it takes those we regulate to resolve complaints in 2026. This will enable us to understand and analyse it and use for regulatory purposes. We can then further explore how and whether to publish it.*

**'How and whether.' Not when.**

Eight years after the first decision: more data will be collected, publication at firm level remains unresolved, and the signpost is unchanged.

### And then even the rule changes were withdrawn

What the SRA did decide to do in October 2025 was to strengthen the rules on how firms give clients complaints information. Those changes required approval from the Legal Services Board.

**In January 2026 the Board indicated it was not ready to accept the proposals in their current form, and the SRA withdrew them.** The requirements that were withdrawn were modest: that complaints information be given to a client at the end of a matter, on request and if a complaint is made during the matter, and that it be clear, accessible and in a prominent place on the firm's website.

On **3 July 2026** the SRA opened a supplementary consultation, closing on **1 September 2026**, asking about two further requirements: that a client be given a timeline for resolution when a complaint is first made, and that they be kept updated on its progress.

On the question this report is about, that document is explicit. Of the 2025 positions, including collecting and publishing additional complaints data, it says:

*These are unchanged and we still intend to proceed as planned.*

**So the position as this report is published is the position of June 2018.** The ledger is not published. Timeliness data will be collected during 2026, after which the SRA will consider how and whether to publish it. The signpost stands where it was put in 2019.

## 9. June 2026: the destination starts to move

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On 10 June 2026 the Office for Legal Complaints opened a twelve week consultation on its scheme rules, case fees and the publication of ombudsman decisions. It closes at midday on **2 September 2026**.

It proposes a change of long standing policy:

*LeO intends to move away from only publishing high-level statistical data, towards a position where every ombudsman final decision will be considered for full publication on LeO's website.*

And it describes the present arrangement in terms the SRA should read carefully:

*the current data-only approach presents an incomplete picture of the standard of service which a provider has given to its customers, and so can only play a limited role in helping consumers decide which provider to engage. It also doesn't help consumers gauge whether they have experienced detriment, and to understand whether it's worth pursuing a complaint.*

**That is the Ombudsman, in June 2026, describing the record the SRA has relied on since June 2018 as one that can play only a limited role in helping consumers choose.** The SRA's 2018 trial found people could make good choices on that data. The Ombudsman's own assessment of it, eight years later, is in the paragraph above.

Two things follow and they pull in different directions, so both belong here.

**The destination is being repaired.** If the Ombudsman does what it proposes, the SRA's signpost will eventually point at something substantial.

**But the consultation says nothing about the twelve month rule.** It proposes to publish more about each decision. It does not propose to keep any of it for longer. On the face of the document a fully published decision would be removed on the same schedule as a bare data row, and full publication is 'unlikely to happen before 2027/28'. If that is right, the record will be richer, just as temporary, and the measurement in chapter four will produce the same answer.

We have asked the Ombudsman to confirm whether the twelve month rule is within the scope of the consultation, and if not, whether it is under review at all.

It is worth saying plainly which body is moving. The Legal Ombudsman is consulting on publishing more. The SRA, in October 2025, decided to explore how and whether.

## 10. What has to change

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This report has been careful with the SRA's arguments and has quoted them at length. It ends less carefully, because the evidence does not support a neutral ending.

The 2018 decision was not a decision to publish nothing. It was a decision to publish nothing **and to send consumers somewhere else instead**. The second half has never been tested by anyone, and on the evidence in this report it fails on the firms where it matters most.

| What the 2018 undertaking assumed                                | What we found in August 2026                                                                                                          |
|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| The signpost is on the page the consumer reaches                 | It is on 131 of 151 pages, and missing on all 20 pages for firms that are closed, revoked, ceased or intervened in                    |
| The destination holds a record of the firm                       | For 73 of the 131 signposted firms, the search returns nothing                                                                        |
| The destination is the better record because it is checked       | The Ombudsman itself said in June 2026 that this data gives an incomplete picture and can play only a limited role in consumer choice |
| The consumer can act on it at the speed of a purchasing decision | Anything older than twelve months is available only on a Freedom of Information request                                               |

### The demand

Blind Justice does not say the raw complaints ledger must be published tomorrow, in the form the SRA holds it, without context. The SRA's objections to that are on the record and some of them have force.

**What is indefensible is the present arrangement, which is neither.** The regulator withholds the record it has, and the record it points to expires. A consumer is left with no durable source of complaints information about the firm they are about to instruct, and the body that could change that has now twice declined to.

So the demand is in the alternative, and either limb answers it:

**Either publish a properly contextualised firm level complaints indicator**, with the SRA's own caveats attached, in a form the SRA is content stands behind.

**Or secure a permanent, searchable Legal Ombudsman record**, so that the signpost the SRA gave consumers in 2018 leads to a firm's history rather than to the last twelve months of it.

**Doing neither is a choice, and it is the choice that has been made every year since 2018.**

### And one document

Publish the internal review, assessment, meeting paper or consumer testing material in which the twelve month deletion rule was considered before the Ombudsman's data was adopted as the substitute for publication.

If none exists, say so.

## **Nobody is requiring any of this, which is the point**

It would be easy to assume a regulator is breaching an obligation here. On the material we could find, it is not.

The Legal Services Board issued statutory requirements, statutory guidance and a statement of policy on first tier complaints under section 112 of the Legal Services Act 2007 in May 2024, in effect from November 2025. The binding requirements are about telling a client in writing that they have a right to complain and how to contact the Legal Ombudsman. The expectation that regulators gather and analyse complaints data sits in guidance rather than in the requirements, and we found nothing requiring any regulator to publish complaints data at firm level. We take that from the requirements as reproduced by another approved regulator rather than from the LSB document itself, which we could not retrieve, and we have put it to the SRA as a question rather than asserting it as a finding.

The same is true of the twelve month rule. Our earlier audit found no published legal or regulatory requirement imposing it.

**Which means every part of this arrangement is a choice, made by public bodies, that could be unmade.**

The ledger itself remains where it has been since 2012.

# Method and limits

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## Sources

Every quotation in this report was taken from the primary document named beside it, opened on 23 August 2026. Where a document is archived, the capture date and archive are given. No quotation is taken from a summary, a news report or a restatement where the original was available. Where the current SRA page restates the 2018 undertaking, we quoted the 2018 original.

## The archive

Eleven decision files were recovered from the UK Government Web Archive and, for the October 2014 file, from the Internet Archive. Each was parsed with a CSV reader that handles quoted fields and embedded newlines rather than counted by line. Blank and delimiter only rows were removed. Firms were taken as the legal entity name field, uppercased and trimmed. All eleven reconcile exactly with our earlier harvest on both row count and firm count.

The 31 May 2017 file parses at 2,494 data rows against a published figure of 2,516 because it ends in 22 rows of pure delimiters. Our published correction of that figure is confirmed at source.

## The register audit

Firm names were resolved to SRA numbers using the SRA's data interface, on a dataset of 25,037 organisations retrieved on 23 August 2026, matching against practice name, trading names and previous names under a normalisation that strips corporate suffixes, punctuation and connectives. Only firms resolving to exactly one organisation were audited. Each register page was retrieved once and parsed for the complaints panel, the Ombudsman link, and the wording of the regulatory record.

## The search test

Each firm name was submitted to the Legal Ombudsman's provider search on its decision data page and the number of firms and decisions returned was recorded. The name used was the name as the Ombudsman itself published it in its decision files.

## Limits, stated plainly

**The sample is purposive, not random.** It is the firms with the most persistent published complaints records. It is designed to be the hardest test of the signpost, not a representative picture of all 25,000 organisations on the register. A random sample would produce a higher rate of empty results, because most firms have never had an ombudsman decision at all.

**Fifty six of the 207 firms could not be audited**, forty because the name matched more than one organisation and sixteen because it matched none. We have assumed nothing about them.

**Absence from the current record is not proof that a particular decision was deleted.** It is proof that the search a consumer is directed to returns nothing for that firm today.

**We have not asked the SRA for unpublished data.** Everything here is from published material and public interfaces.

**We do not assert that any individual knew of the twelve month rule in 2018.** We assert that the rule was published and in force, and we ask for the assessment.

## **What we killed**

A cross scheme count of 15,988 distinct decisions across the ten archived captures. It is an attractive number and it is not usable, because the decision identifier scheme changes at least four times across the period: bare numerics in three different and non overlapping ranges, then CRM prefixed identifiers in 2019, then D prefixed identifiers from 2020. The same decision could carry different identifiers under different schemes. No cross scheme total is defensible.

An inference of roughly eleven thousand decisions from the D prefixed identifier range, which runs from D001381 in May 2020 to D012442 in the current file. Sequences have gaps. It is a question for the Ombudsman, not a finding.

Any claim about how many first tier complaints reach the Ombudsman, because it is not published and we will not estimate it.

In fairness to the Ombudsman, one further point belongs here. The current published file is not poorer in every respect than the older ones: it adds a column recording whether the firm's own complaint handling was reasonable, which the 2015 to 2018 files do not carry.

# Right of reply

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This report was sent in full to the Solicitors Regulation Authority and to the Legal Ombudsman on the day it was published, with the questions set out below. It was not held back for a reply, and neither body was asked to approve it.

**The undertaking we give instead is this.** Any reply from either body will be published in full and without editing, whenever it arrives and however long it is. It will be published alongside this report and alongside the letters that asked the questions, so that a reader can see what was asked as well as what was answered. Where a reply corrects a fact, the correction will be made in the text and the change recorded. Where a question is not answered, this report will record that it was asked and not answered.

## Questions put to the Solicitors Regulation Authority

1. The complaints panel is written into the page by a script embedded within the 'Legal services at this firm' panel. Pages for firms that are revoked, ceased, intervened in or not SRA regulated do not carry that panel, and in consequence carry no complaints information and no route to the Legal Ombudsman. In our sample the correlation was exact, at 131 out of 131 and 20 out of 20. Is that intended, and if it is not, when will it be corrected?
2. Please identify the document, assessment, meeting paper or consumer testing material in which the Legal Ombudsman's twelve month deletion rule was considered before the SRA decided to rely on Ombudsman data as the substitute for publication of firm level complaints information. If no such assessment exists, please confirm that. The rule was published and in force from at least September 2012, five years and nine months before the decision of June 2018.
3. Has the SRA reviewed at any point since 2018 whether the signpost achieves what paragraph 91 intended, and if so what did the review find?
4. Is the SRA's primary reason for not publishing first tier complaints data at firm level still the absence of verification, as stated at paragraph 90 in 2018, or is it now the risk that publication would change how firms record complaints?
5. What would verification of the first tier complaints data cost, and has that figure been calculated?
6. Paragraph 93 of the 2018 paper records that the SRA monitors complaints data at individual firm level and may engage with a firm where it sees a pattern. What is the reason the same data cannot be shown, with the SRA's own caveats, to a client of that firm?
7. For each year since 2018, how many firms have been engaged with under that monitoring commitment, what triggered the engagement, what action followed, and how many of those firms were subsequently intervened in, revoked, closed or referred to the Solicitors Disciplinary Tribunal? Annual counts and anonymised outcome categories would answer this.
8. The most recent published First Tier Complaints Report covers 2023 and was published in May 2024. The consultation response of 14 October 2025 cites a 2024 figure. Has a report covering 2024 been published, and if not, when will it be?

9. The consultation response of 14 October 2025 says the SRA will collect timeliness data in 2026 and then explore how and whether to publish it. What would have to be established before the SRA would publish complaints information at firm level?
10. Does the SRA intend to respond to the Office for Legal Complaints consultation which closes at midday on 2 September 2026, and will it express a view on how long published decisions should remain available?
11. Is the SRA content that a person researching a firm the SRA has closed down to protect the public is given, on that firm's register page, no complaints information and no route to the Legal Ombudsman?
12. The supplementary consultation which closes on 1 September 2026 states that the SRA's positions on collecting and publishing additional complaints data are unchanged. Does that mean firm level complaints information will not be published before the timeliness data collected during 2026 has been analysed, and if so when will that analysis conclude?

## **Questions put to the Legal Ombudsman**

1. Is the twelve month removal rule within the scope of the consultation which closes at midday on 2 September 2026, and if it is not, is it under review by any other route?
2. If every ombudsman final decision is considered for full publication from 2027/28, will published decisions still be removed after twelve months?
3. Does the Ombudsman accept that the SRA directs consumers to its published decision data as the substitute for the firm level complaints information the SRA does not publish, and has there been any discussion between the two bodies about whether the twelve month rule affects that arrangement?
4. How many requests for decision data older than twelve months have been received under the Freedom of Information Act in each of the last five years, and how many were answered in full?
5. Do the twenty seven public interest decisions remain published for twelve months only, and what becomes of them afterwards?
6. Within the D prefixed identifier scheme, decision references in our archive run from D001381 in the file of 15 May 2020 to D012442 in the current file. Is that sequence continuous, and if it is, how many ombudsman final decisions have been made in that period?
7. The consultation states that the current data only approach presents an incomplete picture and can play only a limited role in helping consumers choose a provider. Has that view been communicated to the SRA, which relies on that data in its register?
8. When a published decision is removed from the website after twelve months, what retention period applies to the provider level information the Ombudsman holds and uses for referrals to the SRA? In other words, does the intelligence outlast the publication?

# Sources

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**Solicitors Regulation Authority, Looking to the Future: Better Information, more choice. Our post consultation position, June 2018.** Paragraphs 15, 73 to 76 and 81 to 94. [sra.org.uk](https://www.sra.org.uk)

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**Withdrawal of the SRA's complaints rule changes, January 2026.** Reported by Legal Futures, 14 January 2026, recording that the Legal Services Board was not ready to accept the proposals in their current form.

**Solicitors Regulation Authority, First Tier Complaints Report 2023, published 23 May 2024.** Series 2013 to 2023, complaint categories, resolution rates. [sra.org.uk](https://www.sra.org.uk)

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**Legal Ombudsman, Public Interest Decisions.** Twenty seven decisions, PID-001 to PID-027. [legalombudsman.org.uk](https://legalombudsman.org.uk)

**Archived Legal Ombudsman decision files.** Ten captures from the UK Government Web Archive, June 2015 to May 2020, and the capture of 26 October 2014 from the Internet Archive.

**Blind Justice UK, earlier published work on the removal of Legal Ombudsman decisions.** The figure of 11,448 removed entries is drawn from that work and is not restated as a new finding here.