

Consultation on changes to CRL's requirements for first-tier complaints

Executive Summary

Good complaint handling is critical to a well-functioning legal services market that delivers good consumer outcomes. When things go wrong, consumers should feel confident that any complaint will be taken seriously.

There are many areas of good practice among the firms we regulate, who, because of their size, are closer to consumers than many others. But even so, we think there is scope for improvement ten years after the current rules were introduced.

Following the publication of the Legal Services Board Statement – first-tier complaints, we have been considering how to review our requirements for first-tier complaints to ensure good practice.

Our proposals are intended to set:

- clearer expectations of what must be included in a complaint handling procedure (CHP)
- when and how information must be communicated to clients about the CHP and following a complaint
- requirements firms must take to monitor, learn from complaints and improve complaints handling and service provision.

We are now consulting on these proposals. Your views will help us deliver proportionate and targeted regulation that meets these objectives. This consultation is open until 5pm on 15th August 2025. We look forward to hearing from you.

Introduction

1. CILEx Regulation (CRL) is the independent regulator for chartered legal executives, other grades of CILEX membership, CILEX Practitioners and firms. We take a risk based and outcomes focused approach to regulation, by working constructively with our regulated community to ensure that they deliver the best outcomes for clients. We have set clear principles within our Code of Conduct and inform the public of the standards they can expect.
2. The purpose of this consultation is to determine whether CRL should make an application to the Legal Services Board to:
 - introduce new Complaint Handling Rules and
 - amend the Complaint Handling by Firms requirements at Regulation 13 of the [CILEx Regulation-ACCA Handbook 2021](#).
3. We welcome responses from our CILEX Authorised Entities, CILEX-ACCA Probate Entities, regulated community and other stakeholders including other approved regulators, consumers of legal services and any other interested parties.
4. This consultation will run from 23rd June 2025, closing at 5pm on 15th August 2025.

Section 1: Background

5. A first-tier complaint (FTC) is a complaint made to an authorised person about the legal services they have provided. This is distinct from a second-tier complaint (STC) which is a complaint made to the Legal Ombudsman under the scheme rules of the Office for Legal Complaints. FTCs, in this context, are concerned with complaints about the legal service provided, rather than complaints about the conduct of authorised persons¹.
6. An effective redress system is an important part of access to justice and consistent with the regulatory objectives of protecting and promoting the interests of consumers, protecting and promoting the public interest, improving access to justice and increasing public understanding of the citizen's legal rights and duties. Despite this, many have concerns that complaint handling could improve across the legal services sector.
7. In its 2023 FTC consultation², the Legal Services Board (LSB) explained that they consider FTC resolution is not currently meeting consumers' expectations as well as it should. According to data published by the Legal Services Consumer Panel (LSCP), a sizeable proportion of legal service users are dissatisfied with the service they have received but do not raise this with their legal service provider. In 2024, 21% of consumers were dissatisfied with their provider but did nothing about it³, and while 32% raised a concern they did not make a formal complaint.
8. Research⁴ in 2019 showed that legal service users can lack confidence that their complaint will be taken seriously and consider that making a complaint will be an arduous process. The LSCP Tracker survey 2024 support this – only 48% of consumers complain to the provider firm first. Of those who would not complain to the firm, 33% do not trust their provider to deal properly with their complaint, 32% said it would take too long, 28% thought that it might affect their bill, and 14% said the provider was too hard to get hold of. There is also evidence that information about how to make a complaint can be hard to find⁵. Problems in relation to complaints are amplified for consumers in vulnerable circumstances⁶.
9. LSB analysis⁷ of Legal Ombudsman (LeO) data suggests that a substantial number of complainants are either unable, or unwilling, to see the first-tier process through to completion, raising questions about complainants' confidence in their legal service provider's ability and fairness to resolve. A high number of complaints are escalated

¹ Conduct complaints are covered by the CILEX Code of Conduct, dealt with through our disciplinary processes, and as such are outside the scope of this consultation.

² LSB [Consultation document on first tier complaints with annexes](#)

³ L [LSCP Tracker Survey 2024](#) p33

⁴ [22.07.19-How-consumers-are-using-legal-services-report-FINAL.pdf](#)

⁵ [leo-transparency-research-report-final.pdf](#)

⁶ Refugee Action, "Consumer barriers to complaints", January 2022

⁷ LSB [Consultation document on first tier complaints with annexes](#)

to LeO prematurely⁸, and many have been handled inadequately at first-tier⁹. In 2023/24, LeO found 46% of first tier complaint handling to be inadequate¹⁰. As a result, the volume of complaints received by LeO has led to a backlog of complaints and delays to cases being resolved.

10. Following their own analysis and consultation, the Legal Services Board (LSB) issued a [Statement of Policy - first-tier complaints](#) (SoP) in May 2024 with the objective that regulators deliver a step-change improvement in the resolution of first-tier complaints and foster a culture where legal professionals are receptive to, and learn from, complaints and feedback on their services.
11. The SoP requires regulators to take proportionate and targeted measures, so far as reasonably practicable, to:
 - ensure the ongoing effective, efficient and fair resolution of FTC by authorised persons;
 - identify and address issues and good practice arising from complaints and feedback from users of legal services; and
 - use this learning to embed a culture of continuous improvement, where a focus on the root cause of issues and the dissemination of good practice raises standards in legal services.

⁸ Complaints received by LeO are deemed as “premature” where the complainant has not exhausted the first-tier process. See [Office for Legal Complaints Annual Report and Accounts 2022/23](#), p35

⁹ LeO’s [“Overview of annual complaints data 2020/21”](#), (p21)

¹⁰ [Chief Ombudsman letter to Regulator CEOs November 2024](#)

Section 2: CRL's assessment

12. Following publication of the LSB's SoP, we conducted a number of activities to assess where our regulation and expectations might have to change to deliver the step-change in performance sought by the LSB. These were:
- An assessment of legal sector research and information from the Legal Ombudsman relating to complaining about poor service and measures firms can take to make improvements.
 - Discussions with other regulators about the approach they are considering taking towards meeting the LSB's expectations. We have reflected on these in light of the similarities and differences in respective regulated communities and regulation.
 - A survey of firms to fully understand what procedures they have in place to handle complaints, what they view as complaints, how they handle complaints and their actions to resolve them.
 - A survey of clients that have used legal services provided by our firms to gain information about their experience of receiving information about complaints procedures, and their views on this information.
 - A review of firms existing complaints handling procedures (CHP). Our firms must provide their CHP at authorisation and in their annual return.
 - A gap analysis of the LSB's SoP and new complaints handling expectations of regulators, the [s112 requirements](#), against our regulatory arrangements.
13. These activities demonstrated that there is inconsistent application of rules and best practice in the market that we regulate. For example, firm and client surveys highlighted differing experiences of the provision of complaints information between clients and firms. All firms confirmed that they have a complaints procedure and provide it in writing at the outset of a case. Some firms confirmed that they provide complaints information again at different points during a case, including:
- If a client expresses dissatisfaction (29% of firms)
 - If a client states they wish to complain (35%)
 - At the end of the case (6%)

Despite a requirement to do so, only 76% of clients state that they have received complaints information.

14. Our review of firm's complaint handling procedures found that standards can be mixed. On application for authorisation, we have found that some initial CHPs are convoluted, verbose, use terminology and wording that is not consumer friendly, lack appropriate timings or stages for handling and fail to provide accurate information about second-tier complaints or signposting to LeO. In such instances, we actively work with firms to improve their complaint handling procedures through our supervision team. However, the need for our support demonstrates the benefit of clearer expectations and rules.

15. Our review also suggested that there is not a culture of continuous improvement in complaint handling. On annual renewal, many firms fail to update their CHP with such changes as new firm contact details or LeO scheme rules, resulting in the need for further support. This evidence suggests that stronger regulatory arrangements are needed to support our supervisory work.
16. Finally our gap analysis suggests that our current regulatory requirements do not meet the expectations set out by the LSB. Our current high level Code requirements and guidance for individuals and CILEX authorised firms do not provide sufficient detail and clarity to ensure good consumer outcomes.
17. We have therefore concluded that we need to amend our regulatory arrangements to set out:
 - clearer expectations of what must be included in a complaints handling procedure (CHP);
 - when and how information must be communicated to clients about the CHP and following a complaint; and
 - requirements firms must take to monitor, learn from complaints and improve complaints handling and service provision.

Section 3: Our current requirements and proposed changes

Current requirements

18. We currently have different approaches in our regulatory arrangements for our individuals and CILEX Authorised firms, compared to our CILEX-ACCA Probate Firms.

Individuals and CILEX Authorised firms

19. CRL's current complaints handling requirements of regulated individuals and CILEX Authorised firms are provided at a high level via the [CILEX Code of Conduct](#) (the Code):

5.9 inform your client fully as to your complaints procedure including their right to refer a complaint to the Legal Ombudsman or CILEx Regulation where appropriate;

5.10 not charge a client for the cost of handling a complaint

20. The Code is supported by detailed [guidance](#). These regulatory arrangements stem from the commencement of our regulation and establishment of our Code. They follow the LSB's s112 requirements at the time and take an outcomes focused approach. The guidance was updated in 2016 to meet the new requirements of the LSB's [July 2016 s112 requirements](#).

CILEX-ACCA Probate firms

21. Our complaints handling requirements for CILEX-ACCA Probate firms comprise:
- the [Code](#) requirements which are mirrored in the CILEX Regulation-ACCA firm [Handbook](#) (Handbook) Annex 8 (5); and
 - Complaints Handling Procedure regulations which are set out at Regulation 13 of the Handbook and complaints handling guidance provided in the [Regulatory guidance for CILEX-ACCA probate entities](#).
22. This different regulatory approach came about when CRL established the route to assume regulation of ACCA Probate Practitioners and Firms from the [ACCA](#). As detailed in our [application](#) to the LSB, where possible we replicated the wording contained within the 'ACCA Rulebook' into the CILEX Regulation-ACCA firm Handbook. This included the ACCA requirements for complaints handling.

Proposed approach

23. We considered a range of potential regulatory changes and approaches that we might take to meeting the LSB's expectations and deliver an improvement in complaint handling performance. In reaching our proposals, we have considered the approach which is best for our regulated community. We regulate 7600 individuals and 57 firms providing legal services across all the reserved legal activities and some unreserved legal work. Of these 21 are CILEX Authorised Entities and 36 are CILEX-ACCA Probate Entities.
24. The regulatory approaches we considered were to:
- Make no changes to our regulatory arrangements – based on current practice in the market and the changes sought by the LSB, we consider this to be insufficient to deliver good outcomes for consumers.
 - Amend guidance – while we considered amending Guidance alone and see the merits of this approach, we do not believe this is sufficient to deliver the changes sought or required. First, guidance is non-binding and would not provide the necessary regulatory arrangements to support the authorisation and supervision of firms to achieve good consumer outcomes. Second, the inconsistency of regulatory approach across both Authorised Persons and CILEX Authorised Entities and CILEX-ACCA Probate firms would remain.
 - Introduce new Complaints Handling Rules for Authorised Persons and CILEX Authorised Entities and change the complaints requirements set out at Regulation 13 of the CILEX Regulation-ACCA Handbook to mirror the new Rules.
 - Amend our Code of Conduct - we considered amending the Code (Regulation 8 of the CILEX Regulation-ACCA Handbook mirrors the Code and would also require the same changes). We concluded that changing the Code would not be practical at this time given the volume of the LSB's s112 requirements or in keeping with our outcomes focused Code. We are considering a more comprehensive review of our Code of Conduct in the future and will look to incorporate any proposals in this review as appropriate.
25. We have concluded that the most proportionate and targeted approach is to introduce Complaints Handling Rules which will apply to the individual authorised persons that we regulate – namely Chartered Legal Executives and CILEX Practitioners where relevant - and CILEX Authorised Firms. We will also make amendments to Regulation 13 of the CILEX Regulation-ACCA firm Handbook to mirror as appropriate the new Complaints Handling Rules. We are consulting on our proposed changes.
26. For the avoidance of doubt, we propose that where authorised persons are employed in a firm authorised by another regulator, the firm's complaint's policy will apply¹¹. If

¹¹ In instances where regulated persons fall within the remit of more than one regulator, [section 52\(4\) of the Legal Services Act 2007](#) provides that the regulatory arrangements of the entity regulator prevails over the regulatory arrangements of another regulator for an individual who is an employee or manager of the entity, where there is conflict between the two.

an authorised person works in an unregulated firm, then they would have to comply with our proposed rules. And where an authorised person is dual qualified, any regulatory overlap would be managed in accordance with existing inter-regulatory arrangements as set out in our Memorandums of Understanding¹².

27. As set out at Annex A, our proposed new Complaint Handling Rules (for authorised persons and CILEX Authorised Firms), and Annex B amended Regulation 13 (for CILEX-ACCA Probate firms) set requirements for:

- complaint handling rules, including what must be in the rules;
- the prominence of the complaint handling rules and when a client must be informed about it;
- how an authorised person and firm communicates with a complainant; and
- complaint recording and monitoring.

28. In addition to these proposed changes, we considered:

- Amending existing guidance to support the new Rules/amended Regulation 13. Responses to our firm survey indicate 65% use CRL guidance. The firm and client surveys also identified areas where firms would benefit from support. We intend to do this once this consultation has been completed. Examples of what guidance may include are:
 - identifying a complaint
 - explaining wording used in the new rules/amended regulation 13
 - effective communication and appropriate language
 - supporting clients with vulnerabilities
 - responding to, and resolving a complaint and following up on remedies.
- Different approaches to collecting complaints data ranging from a) collecting increased information from all approved persons to b) collection of new items of complaints data from firms on authorisation where appropriate, annual return and site visits; and to run the first-tier complaints handling survey (FTCH survey) of authorised persons who indicate that they have received a complaint during the last year on annual renewal. We believe that option b) represents the most proportionate option and we propose to proceed with this. In doing this, we can increase the complaints data that we monitor for our firms. The majority of our individual authorised persons work in firms authorised by other regulators and as such the complaints requirements of the firm's regulator take precedence. We can broaden our insight into complaints and complaint handling via the FTCH survey.
- Introducing a complaints handling template. We are currently working with the Legal Ombudsman (LeO) and other legal regulators on the development of a model complaints resolution procedure (MCRP). LeO plans to offer a template first-tier complaint procedure that can be used by any legal service provider, together with guidance and other supporting materials. Benefits of a

¹² [MOU CRI and SRA](#) and [Framework MOU](#)

MCRP could include clear and uniform information about how to make a complaint for consumers and provision of clear expectations for firms. We will consider offering a template in the guidance we are developing, while being transparent with firms that this may be subject to change following conclusion of the LeO work.

Questions

1. Do you agree with our general approach to introducing Complaint Handling Rules (rather than changing our Code)?

Yes/No?
comments

2. Do you agree with our intention to introduce guidance and bolster our monitoring of complaints?

Yes/No?
Comments

3. What information would you welcome in guidance to support you to implement the new Complaint Handling Rules/amended Regulation 13?

Comments

4. Would you welcome a model complaints resolution procedure that has been developed in conjunction with other regulators and LeO?

Yes/No?
Comments

New Complaint Handling Rules and amended Regulation 13 of the CILEX Regulation-ACCA firm Handbook

29. We have drafted new Complaint Handling Rules and amended Regulation 13 of the CILEX-ACCA firm Handbook. These are available at Annex A and B.

Questions

5. Do you foresee any issues with the **interpretation** of the **new Complaint Handling Rules**?

Yes/No?

comments

6. Do you foresee any issues with the **implementation** of the **new Complaint Handling Rules**?

Yes/No?

comments

7. Do you foresee any issues with the **interpretation** of the **amended Regulation 13** in the CILEX-ACCA firm Handbook?

Yes/No?

comments

8. Do you foresee any issues with the **implementation** of the **amended Regulation 13** in the CILEX-ACCA firm Handbook?

Yes/No?

comments

Section 4: Monitoring and evaluation

30. The overarching objectives of the new requirements are to provide:
- clearer expectations of what must be included in a complaint handling procedure
 - when and how information must be communicated to clients about the CHP and following a complaint
 - requirements firms must take to monitor, learn from complaints and improve complaints handling and service provision.
31. We have been considering how we monitor the implementation of the proposed Rules and evaluate their effectiveness. We currently collect and monitor information about complaints supplied by firms, provided by LeO and other stakeholders. We will continue with targeted and proportionate supervisory activity, which will include monitoring implementation of the new requirements when a firm is authorised, on annual renewal and site visits. Where issues with specific firms are identified we will address these through supervision and support in the first instance. Where necessary, a firm may be referred to our enforcement function.
32. To monitor effectiveness, we will continue to analyse firm complaints information to identify trends, risks and learning opportunities. We intend to publish information about complaints every two years.
33. The majority of our individual authorised persons work in firms authorised by other regulators and as such the complaints requirements of the firm's regulator take precedence. We will also periodically gather information about complaints from our authorised persons working in legal firms outside our regulation via a first-tier complaints handling survey. This will broaden our insight into complaints and complaint handling.
34. We regularly communicate complaints and service provision best practice, LeO courses and other information published by LeO to our regulated community via our monthly News Letter, CILEX Journal articles and social media. We promote learning about complaints handling best practice as part of continuous professional development. We are building these regular communications into our annual communication plan.

Section 5: Impact Assessment

New Complaint Handling Rules and costs and benefits to consumers

35. The new Complaint Handling Rules are more prescriptive about the LeO information which must be included and the time period that a firm has within which to resolve a complaint. This supports consumers understanding and confidence to first approach the firm with their concern with the knowledge that they have later recourse to Legal Ombudsman (LeO).
36. One of the more significant changes is the requirement to increase the points during the client journey when the firm must provide clients with the CHP. Firms will be required to provide complaints information, including information about any right to escalate a complaint to the LeO on engagement, conclusion of the case, on request and when a complaint has been made. In this way clients will receive complaints information at times when they may, or do, need to complain, rather than only at the beginning of their relationship with the firm, when they are unlikely to be thinking about complaining. Research into client care letters¹³, recommended that reminders about a firm's CHP could be sent later on in the legal process in addition to inclusion in the client care letter, to ensure that this information has cut-through. Ensuring clients know at the relevant time that they can raise concerns with their firm and how to do this will increase client confidence to raise a complaint if necessary.
37. The increased requirements on a firm to reasonably tailor their communications about their CHP to meet individual client's specific circumstances and information needs will facilitate clients' understanding and ability to access the CHP. This will be of particular benefit to clients in circumstances or with needs that increase their vulnerability.
38. Increased direction and clarification on how a complaint must be dealt with will increase client's confidence that their complaint is being taken seriously, progressed and the firm is committed to resolve their complaint. We anticipate that clients are more likely to see their complaint through the complaints process with the firm and thereby reduce the number of complaints to LeO.
39. Requirements are being introduced to ensure the highest level of management buy-in to the resolution of complaints, that procedures are in place to ensure staff understand and operate the CHP and that a firm must implement CHPs consistently and regularly review them. In addition to the existing requirement to record complaints, firms must have measures to identify issues and learning in relation to both handling of complaints and service provision. This will bring about a culture of continuous learning and improvement in dealing with complaints and provision of service and ensure better service for consumers.
40. We do not believe the new requirements add significant cost to consumers.

¹³ [Client-Care-Letters-Research-Report-FINAL-201016.pdf](#)

New Complaint Handling Rules and costs and benefits to firms

41. We appreciate that there will likely be upfront costs to developing and implementing a new CHP. We will look to minimise these costs as far as is possible and appropriate. We will encourage early compliance with these proposals and propose to use the annual return process to support firms in updating their policies if necessary (we know that some firms will likely have complied with these proposals ahead of their annual return). Indeed, we propose not to enforce the proposed complaint handling rules at the first annual return post-implementation, allowing regulated entities a proportionate period of time to adjust to the proposed requirements.
42. Having said that, there are proven benefits for firms in having a good CHP. Communicating about complaints and handling them effectively enhances consumer trust and confidence to both engage a firm to provide legal services and recommend the firm. Indeed, research into the experiences and effectiveness of solicitors' first tier complaints handling processes¹⁴ found that 93% of firms say there are business benefits to complaints handling: most frequently, these are improving service delivery (76%), understanding consumer expectations (71%) and providing a chance to improve consumer retention (63%).
43. Complaints provide a rich source of insight into clients' experience of a firm, the services provided and what clients value. Consumer research frequently identifies that there is often a mismatch between what a firm believes it delivers and how services are perceived by clients. Enabling firms to learn about their strengths, identify their weaknesses and enables firms to make the most impactful improvements in their service delivery. Thereby reducing numbers of complaints, supporting sustainability and growth of the firms' business leading to client retention, repeat business and work from recommendations.

Question

9. Do you agree with our assessment of the costs and benefits of introducing new complaint handling rules?

Yes/No?

Comments

Impact on Equality, Diversity and Inclusion

44. We have conducted an Equality Impact Assessment (Annex C) for consideration as part of this consultation. We believe that the proposals will have limited impact on Equality, Diversity and Inclusion but with the potential to have a positive impact.

¹⁴ SRA and LeO 2017 [research](#),

45. Our proposals are designed to improve consumer awareness and understanding of, as well as access to complain. This may have a positive impact on equality, diversity and inclusion because evidence suggests that some groups, be they vulnerable or less represented, may find it more difficult to complain. Our objective to make it clearer when and how information must be communicated to clients about the CHP and following a complaint may improve outcomes in this regard.
46. At this stage, we do not believe that our proposals will have a negative impact on Equality, Diversity and Inclusion, although we welcome views from stakeholders.

Question

10. Do you agree with our assessment of our proposals' impact on equality, diversity and inclusion?

Yes/No?

Comments

List of Questions

1. Do you agree with our general approach to introducing Complaint Handling Rules (rather than changing our Code)?

Yes/No?

Comments

2. Do you agree with our intention to introduce guidance and bolster our monitoring of complaints?

Yes/No?

Comments

3. What information would you welcome in guidance to support you to implement the new Complaint Handling Rules/amended Regulation 13?

Comments

4. Would you welcome a model complaints resolution procedure that has been developed in conjunction with other regulators and LeO?

Yes/No?

Comments

5. Do you foresee any issues with the **interpretation** of the **new Complaint Handling Rules**?

Yes/No?

Comments

6. Do you foresee any issues with the **implementation** of the **new Complaint Handling Rules**?

Yes/No?

Comments

7. Do you foresee any issues with the **interpretation** of the **amended Regulation 13** in the CILEX-ACCA firm Handbook?

Yes/No?

Comments

8. Do you foresee any issues with the **implementation** of the **amended Regulation 13** in the CILEX-ACCA firm Handbook?

Yes/No?
Comments

9. Do you agree with our assessment of the costs and benefits of introducing new complaint handling rules?

Yes/No?
Comments

10. Do you agree with our assessment of our proposals impacts on equality, diversity and inclusion?

Yes/No?
Comments

How to respond

Please complete the online [response form](#).

Alternatively you can send your response to CILEx Regulation by email to consultations@cilexregulation.org.uk. Please mark it for the attention of Sue Chandler.

Submission deadline

Please respond by 5pm on 15th August 2025.

Annex A: CILEx Regulation Complaint Handling Rules

Introduction

- 1 These are the CILEx Regulation Complaint Handling Rules.
- 2 These Rules apply to Chartered Legal Executives, CILEx Practitioners and Authorised Entities.
- 3 In complying with these rules, you are required to adhere to the CILEX Code of Conduct including but not limited to Principles 2, 4 and 5. An Authorised Entity is bound by the associated regulatory arrangements.
- 4 In seeking to comply with these Rules, you must have regard to:
 - a) CILEx Regulation's Transparency Rules where required and
 - b) any relevant guidance.
- 5 You must, as appropriate in the circumstances, either establish and maintain, or participate in, a procedure for the resolution of complaints in relation to the legal services you provide.

Provision of information

- 6 You must inform your clients about your complaint handling procedure and ensure that clients are informed:
 - a) of the client's right to complain to you about services and charges, including how to complain and to whom;
 - b) of any right the client has to complain to the Legal Ombudsman at the end of your complaints handling procedure if they are dissatisfied with the outcome of their complaint;
 - c) that after eight weeks following the making of a complaint, if the complaint has not been resolved to their satisfaction, of any right to complain to the Legal Ombudsman;
 - d) how to make a complaint to the Legal Ombudsman including:
 - (i) the time limits for doing so;
 - (ii) full details of how to contact the Legal Ombudsman;
 - (iii) information about how to make a complaint available from the Legal Ombudsman;
 - e) of the client's right to complain to CILEx Regulation if the complaint does not fall within the Legal Ombudsman Scheme Rules and include full contact details; and

- f) of the name and website address of an alternative dispute resolution (ADR) approved body which would be competent to deal with the complaint; and whether you agree to use the scheme operated by that body.

7 You must inform clients of the information in section 7:

- a) at the time of engagement on a new matter or the next earliest appropriate opportunity;
- b) at the conclusion of the matter;
- c) upon request; and
- d) if a complaint is made during a matter.

8 You must effectively communicate your complaints handling procedure to each client in a format or formats reasonably tailored for the client's circumstances having due regard to their information needs.

Complaint handling procedure

9 Your complaint handling procedure must:

- a) be prominent and accessible;
- b) make provision for a client to make a complaint in a way that is reasonable and accessible to the client;
- c) explain how a complaint will be handled;
- d) set out the steps that will be taken in resolving a complaint;
- e) ensure that complaints made orally are acknowledged in writing, stating your understanding of the details of the complaint;
- f) provide information on the possible outcomes to a complaint, including any options if a complaint is not resolved to the complainant's satisfaction;
- g) provide for a complaint to be:
 - (i) investigated by a person of sufficient experience, seniority and competence who, where possible, was not directly involved in the particular act or omission giving rise to the complaint;
 - (ii) assessed competently, diligently, and impartially;
 - (iii) responded to fairly, consistently, and promptly;
 - (iv) resolved at the earliest possible opportunity;
 - (v) dealt with free of charge;

h) ensure that when a complaint is first notified, you must provide the complainant with:

- (i) a prompt acknowledgement of receipt of the complaint;
- (ii) clear and comprehensive information about your complaints handling procedure that will apply to their complaint and how it will be handled, including the information specified in section 7;
- (iii) information on who the complainant may contact about their complaint;
- (iv) a timeline for the resolution of the complaint.

10 You must ensure your complaint handling procedure is:

- a) documented in writing and available to staff, where relevant;
- b) endorsed by senior management, where relevant, or person responsible for its implementation; and
- c) implemented consistently and periodically reviewed.

Communication

11 You must:

- a) communicate with the complainant clearly, using plain and appropriate language;
- b) give the complainant regular updates on the progress of their complaint;
- c) communicate promptly the outcome of the complaint to the complainant;
- d) if the outcome includes any offer of a suitable remedy, comply promptly with the remedy if accepted by the complainant;
- e) inform the complainant if they are not satisfied with the outcome of the complaint of the information at section 7.

Record keeping

12 You must maintain records for each complaint including:

- a) details of the complaint;
- b) how it is dealt with; and
- c) the outcome.

Learning from complaints

13 You must implement measures to:

- a) identify any risks or issues including systemic issues in:
 - (i) how it has assessed and sought to resolve complaints and
 - (ii) in its services, and
- b) address those risks and issues;

14 You must consider and undertake appropriate training and provide appropriate support to address the risks and issues identified in section 14a).

Interpretation

In these Rules, unless otherwise provided

Chartered Legal Executive	means a CILEX member authorised by CILEx Regulation to conduct one or more reserved activities (also known as a Fellow of CILEX)
CILEx Practitioner	means a practitioner authorised by CILEX to provide one or more regulated legal activity
Authorised Entity:	means a partnership (including a limited liability partnership), company or sole principal authorised or licensed by CILEx under the Legal Services Act 2007 to: (a) carry on an activity which is a Reserved Legal Activity; or (b) provide immigration advice or immigration services; and where the context permits, references to acts or omissions by such a body shall include the acts or omissions of such a body's principals (including the partners in a partnership, the members in an LLP or the directors in a company) and employees;
CILEX:	means the Chartered Institute of Legal Executives;
CILEx Regulation:	means CILEx Regulation Limited;

Complaint:	<p>has the meaning given by section 128(2) of the Act, and as prescribed under the scheme rules made by the Office for Legal Complaints under Part 6 of the Act;</p> <p>an oral or written expression of dissatisfaction, which alleges that the complainant has suffered (or may suffer) financial loss, distress, inconvenience, or other detriment;</p>
Client:	<p>person for whom the authorised person acts, including prospective and former clients. Once a client makes a complaint, they are referred to in these Rules as the complainant.</p>
Complainant	<p>has the meaning given by section 128(2) of the Act, and as prescribed under the scheme rules made by the Office for Legal Complaints under Part 6 of the Act.</p>
Legal Ombudsman	<p>means the Chief Ombudsman and assistant ombudsmen appointed under section 122 of the Act.</p>

Annex B: CILEx Regulation-ACCA Handbook – Amended Regulation 13

13. Complaint Handling by Firms

13.1 Firms holding a legal activities certificate must establish and maintain a procedure for the resolution of complaints.

Provision of information

13.2 The firm must inform clients about its complaint handling procedure and ensure that clients are informed:

- g) of the client's right to complain to the firm about services and charges, including how to complain and to whom;
- h) of any right the client has to complain to the Legal Ombudsman at the end of the firm's complaints handling procedure if they are dissatisfied with the outcome of their complaint;
- i) that after eight weeks following the making of a complaint, if the complaint has not been resolved to their satisfaction, of any right to complain to the Legal Ombudsman;
- j) how to make a complaint to the Legal Ombudsman including:
 - (iv) the time limits for doing so;
 - (v) full details of how to contact the Legal Ombudsman;
 - (vi) information about how to make a complaint available from the Legal Ombudsman;
- k) of the client's right to complain to CILEx Regulation if the complaint does not fall within the Legal Ombudsman Scheme Rules and include full contact details; and
- l) of the name and website address of an alternative dispute resolution (ADR) approved body which would be competent to deal with the complaint; and whether the firm agrees to use the scheme operated by that body.

13.3 The firm must inform clients of the information in Regulation 13.2:

- e) at the time of engagement on a new matter or the next earliest appropriate opportunity;
- f) at the conclusion of the matter;
- g) upon request; and
- h) if a complaint is made during a matter.

13.4 The firm must effectively communicate its complaints handling procedure to each client in any format or formats reasonably tailored for the client's circumstances

having due regard to their information needs.

Complaint handling procedure

13.5 The firm's complaint handling procedure must:

- a) be prominent and accessible;
- b) make provision for a client to make a complaint in a way that is reasonable and accessible to the client;
- c) explain how a complaint will be handled;
- d) set out the steps that will be taken in resolving a complaint;
- e) ensure that complaints made orally are acknowledged in writing, stating the firm's understanding of the details of the complaint;
- f) provide information on the possible outcomes to a complaint, including any options if a complaint is not resolved to the complainant's satisfaction;
- g) provide for a complaint to be:
 - (i) investigated by a person of sufficient experience, seniority and competence who, where possible, was not directly involved in the particular act or omission giving rise to the complaint;
 - (ii) assessed competently, diligently, and impartially;
 - (iii) responded to fairly, consistently, and promptly;
 - (iv) resolved at the earliest possible opportunity;
 - (v) dealt with free of charge;
- h) ensure that when a complaint is first notified, the firm must provide the complainant with:
 - (i) a prompt acknowledgement of receipt of the complaint;
 - (ii) clear and comprehensive information about the firm's complaints handling procedure that will apply to their complaint and how it will be handled, including the information specified in Regulation 13.2;
 - (iii) information on who the complainant may contact about their complaint;
 - (iv) a timeline for the resolution of the complaint.

13.6 The firm must ensure that its complaint handling procedure is:

- d) documented in writing and available to staff, where relevant;

- e) endorsed by senior management, where relevant, or person responsible for its implementation; and
- f) implemented consistently and periodically reviewed.

Communication

13.7 The firm must:

- f) communicate with the complainant clearly, using plain and appropriate language;
- g) give the complainant regular updates on the progress of their complaint;
- h) communicate promptly the outcome of the complaint to the complainant;
- i) if the outcome includes any offer of a suitable remedy, comply promptly with the remedy if accepted by the complainant;
- j) inform the complainant if they are not satisfied with the outcome of the complaint of the information at Regulation 13.2.

Record keeping

13.8 The firm must maintain records for each complaint including:

- d) details of the complaint;
- e) how it is dealt with; and
- f) the outcome.

Learning from complaints

13.9 The firm must implement measures to:

- c) identify any risks or issues including systemic issues in:
 - (iii) how it has assessed and sought to resolve complaints and
 - (iv) in its services, and
- d) address those risks and issues;

13.10 The firm consider and undertake appropriate training and provide appropriate support to address the risks and issues identified in section 13.9a).

Interpretation

In these Rules, unless otherwise provided

CILEx Regulation:	means CILEx Regulation Limited;
Complaint:	<p>has the meaning given by section 128(2) of the Act, and as prescribed under the scheme rules made by the Office for Legal Complaints under Part 6 of the Act;</p> <p>an oral or written expression of dissatisfaction, which alleges that the complainant has suffered (or may suffer) financial loss, distress, inconvenience, or other detriment;</p>
Client:	person for whom the authorised person acts, including prospective and former clients. Once a client makes a complaint, they are referred to in these Rules as the complainant.
Complainant	has the meaning given by section 128(2) of the Act, and as prescribed under the scheme rules made by the Office for Legal Complaints under Part 6 of the Act.
Legal Ombudsman	means the Chief Ombudsman and assistant ombudsmen appointed under section 122 of the Act.

Annex C: Draft Equalities Impact Assessment (EIA)

Proposed changes to First-Tier Complaint Handling

Date of Assessment: 3rd June 2025

Lead Assessor: Jonathan Levack, Director of Policy and Governance

1. Introduction and Background

Following the publication of the Legal Services Board Statement of Policy on First-Tier Complaint Handling, CRL are consulting on changes to our First-tier complaint handling rules. Our proposals are intended to set:

- clearer expectations of what must be included in a complaint handling procedure (CHP)
- when and how information must be communicated to clients about the CHP and following a complaint
- requirements firms must take to monitor, learn from complaints and improve complaints handling and service provision.

We are conducting a limited Equalities Impact Assessment as part of this consultation.

2. Evidence

Our assessment is qualitative in nature as we have limited empirical evidence on which to base our assessment. We are seeking views from stakeholders as part of our consultation exercise.

3. Assessment of Impact by Protected Characteristic

Characteristic	Assessment
Age	Our proposals intend to reduce the barriers to complaining by providing timely information, a requirement to provide this information in a suitable format and a requirement for firms to monitor and learn from complaints. Therefore, we anticipate that our proposals have the potential to have a slight positive impact for consumers, by age group. This is particularly the case because legal services providers will be required to provide their complaints handling procedure in a format suitable to their client.
Disability	Our proposals intend to reduce the barriers to complaining by providing timely information and a requirement for firms to monitor and learn from complaints. Therefore, we anticipate that our proposals have the potential to have a slight positive impact for consumers with a disability. This is particularly the case because legal services providers will be required to

	provide their complaints handling procedure in a format suitable to their client.
Gender reassignment	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific impact in respect of this characteristic.
Marriage and civil partnership	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific impact in respect of this characteristic.
Pregnancy and maternity	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific an impact in respect of this characteristic. Our proposals intend to reduce the barriers to complaining.
Race	Our proposals may improve outcomes for various communities especially because legal services providers will be required to provide their complaints handling procedure in a format suitable to their client.
Religion or belief	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific impact in respect of this characteristic.
Sex	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific impact in respect of this characteristic.
Sexual orientation	We believe our proposals will have a positive impact for all consumers but either a neutral or no specific impact in respect of this characteristic.

4. Cumulative Impact and Conclusion

Our pre-consultation assessment of our proposals is that they have the potential to have a slight positive benefit on equality and diversity. We therefore intend to consult on the proposals.