



# Quality indicators in legal services

## Pilot evaluation report

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June 2023

# Executive summary

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More people are shopping around for legal services these days. Online information that can help the public compare the quality of providers is an important driver for this.

Between 2021 and 2022, the Solicitors Regulation Authority (SRA), the Council for Licensed Conveyancers (CLC), and CILEx Regulation worked together to undertake a pilot. We wanted to test approaches that legal service regulators might consider in the future to ensure the availability and accessibility of comparable information continues to increase.

Nine review websites and comparison websites took part in the pilot, alongside 70 law firms, completing actions and providing their views and feedback to us as we went along.

More than 6,000 members of the public participated in the pilot's consumer research projects. We also worked with other organisations, professional bodies, and website providers to capture their perspectives.

We learned a lot. We saw enthusiasm and strong levels of interest from consumers in a number of legal service quality indicators, including online reviews and star ratings in particular. Consumers were interested in legal service comparison websites, and ways to find out more about them.

Review websites reported increased numbers of legal service providers and consumers engaging with their platforms. This was supported by targeted work from regulators helping to build that engagement.

We explored barriers that currently inhibit trusted sources of information about legal services from being accessed more widely as a quality indicator by the public. This included data such as Legal Ombudsman decisions.

We also heard about significant benefits that some legal service providers are experiencing from quality indicators, alongside concerns about risks raised by other providers.

We have evaluated the evidence we gathered to consider actions that legal service regulators might take going forwards to positively influence quality indicators and their accessibility to consumers. We are pleased to present our findings in this report.

We also set out seven high-level actions that will be a trigger for legal service regulators, whether working individually or collectively, to continue making progress, and securing good conditions for quality indicators in the legal services market.

# Background

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Members of the public in England and Wales access information about legal services from many sources. This includes web searches, legal service providers themselves, and feedback from people they know.

Information about legal services is increasingly provided to, and accessed by, the public through digital channels. There is evidence that this is helping to empower consumers to compare providers, including the Legal Services Consumer Panel (LSCP)'s [Tracker Survey 2022](#) which confirms:

'More consumers are shopping around this year (43% compared to 30% in 2021), with legal providers providing more information online to make this easier. For example, 65% found it easy to find information about the quality of services in 2022, compared to 51% in 2021.'

Information that helps consumers to compare legal services ('comparable information') can include details of prices and the nature of services. It can also include pieces of information that help to demonstrate the quality of a legal service provider's work, advice, and representation. They are sometimes described as quality indicators.

As the market for legal services continues to move towards digital-first approaches to finding and accessing providers, quality indicators may provide an important source of information to help consumers compare and choose between different providers through their online searches. It is this area of information that we discuss and explore in this report.

## The Competition and Markets Authority's recommendations

In 2016 the Competition and Markets Authority (CMA) published findings from its [market study](#) of the legal services sector in England and Wales. It concluded the market was not working well for consumers, and in particular that not enough information was available to help people shop around. Its [recommendations](#) for legal service regulators included:

- introducing rules to secure improved information transparency from providers about their costs and services
- a clearer focus on public legal education, including the relaunched [Legal Choices](#) website
- more regulatory information becoming accessible to third parties.

In 2020, the CMA assessed the [implementation and impact of its recommendations](#), recognising progress made in areas such as price transparency. It renewed its calls for regulators to focus on actions to help consumers access information that can indicate the quality of different providers. These are referred to as quality indicators.

## Approaches to quality indicators

The LSCP has explored quality indicators, including through its [discussion paper](#) and [consumer research](#). It identifies proxies that can influence consumer decisions rather than information that more accurately demonstrates the quality of legal representation available from different providers. This could include the 'look and feel' of law firm websites.

The LSCP has called on regulators to introduce a framework for quality indicators, and to also consider opportunities to [standardise information for consumers](#).

# Taking a pilot approach

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## Design and launch

In February 2021, the SRA, the CLC and CILEx Regulation launched a pilot to explore legal service quality indicators. We invited digital comparison tool (DCT) providers to take part, alongside legal service providers. This umbrella term is used to describe review websites, price comparison websites and other comparison services.

## Quality indicators pilot

### Timeframe

February 2021 to February 2022

### Areas of law

Conveyancing and employment law – selected to help us explore commoditised services and bespoke advice areas.

### DCTs

- Chawker (now [Vetted Adviser](#))
- [Legal Utopia](#)
- [reallymoving](#)
- [Reviews.io](#)
- [ReviewSolicitors](#)
- [Search4Legal](#)
- [solicitor.info](#)
- [The Law Superstore](#)
- [Trustpilot](#)

### Legal service providers

- 70 law firms providing conveyancing and / or employment law services, of varying sizes, operating within different regions of England and Wales
- 264 legal service providers participating in the survey '[Law firms' views of customer review sites](#)'.

### Consumers

- Focus group with eight consumers exploring value placed on different areas of online information
- '[Consumer Research 1](#)' – 1,000 consumer interviews exploring legal service decision making processes, whether and how providers are compared, and how DCTs can support this
- '[Consumer Research 2](#)' – 5,154 consumer interviews to determine quality indicators found most helpful when deciding on a legal service provider to use.

### Areas of focus

- Online reviews and feedback from consumers
- Sources of independent, trusted data
- Feedback from legal service providers

- ‘Shop around’ calls to action for the public
- Relationships between regulators and DCTs.

## **Participant actions**

We asked DCT providers and legal service providers to complete actions and provide feedback, including the following.

### **DCT providers**

- Following a voluntary code of conduct prepared by the regulators and feeding back on it
- Monitoring and sharing information about engagement by legal service providers, and by consumers, with their platform
- Participating in roundtable meetings and other engagement activities with regulators
- Developing video clips and providing information about their platforms.

### **Legal service providers**

- Taking forward trial activities including engaging with DCTs and publishing information
- Feeding back on experiences and barriers
- Engaging with guidance and digital resources provided by the regulators.

### **Pilot phases and activities**

The pilot explored:

- the effectiveness of online reviews as a quality indicator
- the availability and effectiveness of data from trusted, independent sources as a quality indicator
- other quality indicators.

### **Engagement with consumers**

Following initial exploration through a public focus group we commissioned and delivered:

- Consumer Research 1 - exploring understanding and use of DCTs, with 1,000 online respondents who had used conveyancing, employment or family law services in the past two years
- Consumer Research 2 – exploring consumer rankings for quality indicators, with 5,154 online respondents.

We trialled ‘calls to action’ on quality indicators, including:

- publishing [‘don’t forget to compare’](#) information for the public, promoted through channels including the Legal Choices website, the SRA’s [clickable logo](#) landing page, and through social media activity
- launching and promoting an [interactive tool for consumers](#) to help them find and use legal service comparison websites and online reviews.

### **Engagement with legal service providers**

- [‘Law firm views of customer review websites’](#), a survey of the [Access Group’s](#) members with 264 participants, and including views on price comparison websites

- broadcasting a YouTube webinar '[Online customer reviews](#)' (490 views at 1 February 2023)
- engaging face-to-face with legal service providers, including at the SRA's Compliance Officers Conference and the LegalEx Conference in 2021
- meeting the [Employment Lawyers Association](#) and other professional groups
- 42 interviews with law firms in the pilot
- encouraging pilot law firms to publish data about complaints, data from [His Majesty's Land Registry](#) (HMLR) and employment law specialisms and outcomes
- publishing guidance and information for providers to support them in engaging with DCTs, including:
  - CILEx Regulation's '[reviews and recommendations](#)' information
  - the SRA's [online reviews guidance](#) and [comparison websites guidance](#)
  - the CLC's guide '[using online reviews and comparison websites](#)'.
- trialling [digital resources](#) for providers about DCTs, including how to contact and interact with them.

### **Engagement with DCT providers**

- publishing a [voluntary code of conduct for DCT providers](#)
- engaging with DCTs in the pilot to seek feedback and request data about legal service providers and consumers accessing their services
- making requests to DCTs to republish data on their platforms from trusted, independent sources
- inviting DCTs to provide video content and information about their platforms for a trial [digital resources hub](#) for legal service providers
- meeting with other DCTs, including [Google Reviews](#), [Feefo](#), and [Uswitch](#), to explore the role of DCTs in the legal services market.

### **Exploring approaches used in other sectors**

- accreditation schemes operated by the Office of Gas and Electricity Markets ([Ofgem](#)) and the Office of Communications ([Ofcom](#))
- the [Financial Conduct Authority](#) (FCA)'s requirements
- schemes in other areas including food hygiene, travel and healthcare.

### **Engaging with organisations holding data about legal service providers**

- Legal Ombudsman (LeO)
- HMLR
- [HM Courts & Tribunals Service](#) (HMCTS).

## **Evaluation**

In the remainder of this report we describe our evaluation of the pilot and set out proposals for next steps. Since the pilot's completion the [Legal Services Board](#) (LSB) has published a [statement of policy on empowering consumers](#) that sets expectations for legal service regulators on areas including quality indicators. As part of our evaluation we consider opportunities for regulators to respond to the statement's requirements.

# Online reviews

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## What we did

We explored the use of online reviews as a quality indicator in the regulated legal services sector, considering impacts for providers and consumers. We also used our trial activities to test approaches that regulators might consider using in the future. This was to encourage more consumers to use reviews to help them shop around.

## Consumer perspectives

### General influence and use

Ofcom's [research](#) shows around three-quarters of UK internet users read online reviews, while two in five write them. Reviews are popular quality indicators in many sectors, such as Tripadvisor's [1 billion reviews](#) of the travel and hospitality sector. [Research](#) also shows around £900 of annual household spending being influenced by reviews.

In Consumer Research 1 we investigated the public's general use of online reviews. Just over half (55%) of the 1,000 participants confirmed that they often or sometimes write online reviews of products or services. Eighty eight per cent also confirmed they always or sometimes use review websites before making a purchase.

### Reviewing legal services

In Consumer Research 1, 22% of participants confirmed they had previously used a review website in relation to legal services. This is much lower than the 88% of that same group who always or sometimes use review websites more generally. But over three quarters of the 22% said they had found legal service review websites helpful. The majority use them to check information about particular providers, or in just over a third of cases as their main source of information.

We also asked people who had not used review websites before why that was. Some said they were happy using a particular provider – one they had used previously, or that was recommended to them. However, 13% said they were unaware of these for legal services.

We investigated this further in Consumer Research 2, using scenarios about conveyancing services, employment law, and (for comparability) family law. We asked participants how they would start an online search for legal services and whether they would use a provider, reviews or price comparison website.

After then reviewing fictional webpages featuring various pieces of information, more people said they would consider using review websites to find legal service providers. Across the three areas of law at least 91% of participants confirmed they would click through to a legal service provider's website from a DCT website like this.

The research participants identified star ratings as the most important information for choosing and then comparing providers through DCTs. The number and content of reviews were also placed in the top three attributes for these purposes by participants. Customer reviews and the areas of law specialised in were cited by participants as the most important quality indicators to find when using a provider's own website.

## Trust

Eleven per cent of Consumer Research 1 participants confirmed they did not use review websites. When asked why, almost a quarter referred to a lack of trust, expressing concerns about fake reviews.

[Brightlocal's research](#) shows 62% of consumers believe they have seen a fake review for a local business in the last year. These concerns are longstanding, and a 2021 investigation by [Which?](#) saw the consumer group create a fake company and successfully buy five-star reviews for it.

The UK Government [announced plans](#) in 2022 to introduce rules prohibiting offers to write or commission fake reviews. And requiring websites hosting reviews to take reasonable steps to ensure reviews are genuine.

New compensation and fining powers have been announced for the CMA to enforce the rules. These developments may strengthen consumer confidence in online reviews as a quality indicator.

## Legal service provider perspectives

### Current engagement

We asked participants in our survey of the Access Group's members whether they direct clients to publish reviews on a review website. Of the 232 providers that responded, 44% confirmed they do so, with Google Reviews, ReviewSolicitors and Trustpilot being the most commonly used sites.

During our 42 interviews with law firms we heard that:

- more than three-quarters actively use paid-for subscriptions and / or free-to-use accounts to engage with review websites
- increasing numbers of firms are building review websites 'widgets' into their own websites, providing consumers with quick access to their reviews
- firms are building online reviews into traditional client feedback mechanisms. And as components of compliance requirements for schemes such as the Law Society's [Lexcel](#), or Legal Aid Agency requirements.

## Provider benefits

### Attracting clients

We saw evidence of legal service providers increasingly acknowledging commercial impacts of online reviews. Just under half of respondents to the Access Group survey confirm they routinely monitor the internet for reviews of their firm. Sixty six per cent of the respondents that direct their clients to submit reviews confirm they use review websites to help attract new clients. Fifty six per cent then used them to showcase their client offering.



## **Employee rewards and recognition**

Our law firm interviewees described their use of online reviews to recognise and celebrate staff achievements. Just over half of the Access Group survey respondents who use review websites confirmed they use online reviews to identify good performance.

## **Marketing opportunities for smaller providers**

We heard evidence from smaller law firms about benefits they experience from proactively managing online reviews. This includes using free plans with review websites and using online reviews as a digital marketing opportunity for reaching new clients.

## **Case study - Andrew Baker, Senior Partner at Boys & Maughan Solicitors**

Between November 2021 and March 2022 we were ranked number one in the UK on ReviewSolicitors, which brought in a swathe of new business enquiries. Despite slipping a few places down the table as the year progressed, our high ranking nationally and regionally is continuing to help attract high quality work. Recently we were consulted on a high value dispute by someone living abroad who was seeking the best in their field. It is unlikely that they would have found us had it not been for our review-based reputation.

We believe our success on the platform has resulted from everyone getting involved. This included some of our lawyers who deal with sensitive areas such as family law and litigation who you might think would be least likely to receive online feedback.

We respond to every single review and the responses we receive aid staff development and wellbeing. Our lawyers often say they are pleased to receive public recognition for their skills, and we regularly take the opportunity to acknowledge and share their success.

We rarely receive negative feedback but when we do we quickly respond, and sometimes we take it on the chin. On other occasions an upbeat dialogue with the client helps resolve problems or gives us pointers for the future.

## **Concerns**

In February 2021 [a court judgment ruled in favour](#) of a law firm regarding an online review published about it on Trustpilot. The reviewer was ordered to pay damages to the firm. But following media coverage of the judgment, large numbers of negative reviews from non-clients were submitted to the firm's Trustpilot page. This led to the page being temporarily suspended.

Some of the pilot law firms shared concerns about negative reviews that could not be attributed to a client. This included examples of reviews published on Google Reviews and Facebook that appeared to be written by third parties, such as the opposing side in a case.

Other concerns were highlighted by respondents to the Access Group survey, including:

- risks of inadvertently disclosing confidential client information during replies to online reviews
- situations where genuine clients who had received good service might still leave a negative review where they had not received their preferred outcome for their particular legal issue.

## Pilot activities

### Consumer ‘calls to action’

We published ‘call to action’ messages encouraging people to compare legal service providers and use online reviews. This included:

- new content on the [Legal Choices website](#)
- the CLC’s [‘5 tips for choosing a great conveyancer’](#) guide
- CILEx Regulation’s [‘Reviews and recommendations’](#) resources
- the SRA’s [‘Customer reviews’](#) guide.

We signposted to some of the calls to action at key consumer touch-points, including the SRA’s [Solicitors Register](#) and the SRA’s [clickable logo](#) landing page.

In March 2021 we trialled targeted advertising to understand whether we could proactively direct consumers to these messages and encourage more people to compare providers. We used Facebook ads and Google Display Ads to show information to people whose online activity suggested they may be interested in either conveyancing or employment law services. For example, people who had previously searched for PrimeLocation or Rightmove. The adverts directed consumers towards ‘shop around’ messages on the SRA’s website.

The campaign performed well for both areas of law. Google Display Ads for conveyancing resulted in 5.4% of people who saw the advert ‘clicking through’ to the calls to action. And 4.2% of people for employment law. In both cases we achieved higher click-through rates than 0.35% average rates for Google Display Ads across all sectors.

### Encourage providers to engage with online reviews

We published and promoted information resources for legal service providers about online reviews during the pilot. This included:

- broadcasting the webinar [‘online customer reviews’](#) for legal service providers
- creating information hubs to connect providers with DCTs offering online reviews, including information on the [CLC’s website](#), and DCT video clips on the [SRA’s website](#)
- promoting other information resources for providers, including the SRA’s guidance [‘Engaging with online reviews’](#) and the [CLC’s guide to transparency](#)
- promoting the pilot and its focus on online reviews through legal service media channels and at events including LegalEx in 2021
- updates on [CILEx Regulation’s website](#), the [SRA’s website](#) and the [CLC’s website](#).

To measure impacts we asked DCTs participating in the pilot to monitor changes to their engagement with legal service providers and consumers. We explore this below.

### Monitor engagement rates with online review websites

#### Trustpilot

Trustpilot provided data about its [legal services reviews](#) and, for comparability, its [‘Money and Insurance’](#) category. It reported that, between the first quarters of 2021 and 2022 (the period covered by the pilot), numbers of ‘engaged UK law firms’ saw an increase of 32.6%.

Significantly more new legal service businesses registered ownership of their page on Trustpilot between February and May 2021 than the previous year. Increases were

maintained, with each quarter seeing around a 6% increase in new law firms registering with Trustpilot compared to the previous quarter. They also reported that:

- between March and May 2021 (shortly after the pilot's launch), significantly more invitations to write a review were sent to consumers by legal service businesses. And more reviews were published than during the same period the previous year
- comparison between legal services and businesses listed in the 'Money and Insurance' category shows significantly more legal service businesses and domain claims created in March 2021. And a higher response rate to reviews published about legal service businesses
- the proportion of reviews posted in response to invitations to write reviews sent to legal service consumers increased from 44% pre-pilot to 52% during the pilot
- between the first quarters of 2021 and 2022 there was a 9% increase in the number of reviews submitted about law firms.

It is possible that impacts from Covid-19, or from the February 2021 court judgment, have some bearing over these increases. However, the increased engagement also corresponds with the period of significant promotion of the pilot by regulators, and its focus on online reviews.

Neil Bayton, Trustpilot's Head of UK Partnerships, confirmed:

'Since the start of the pilot Trustpilot has seen a significant increase in legal firms engaging with our platform. Subsequently this has positively impacted the number of reviews we see on our platform for legal firms. Consumers now have greater choice when visiting the site to find great legal firms to work with.'

## **ReviewSolicitors**

ReviewSolicitors reported a 66% growth in numbers of users visiting its platform during the pilot. And a 200% increase in numbers of law firms engaging with the website by the end of the pilot in February 2022 (compared with February 2021).

As of August 2022, 2,000 law firms had responded to at least one review on ReviewSolicitors, and 2,850 law firms had taken control of their listing.

ReviewSolicitors recorded a 150% increase between February and June 2021 in law firms registering to engage with their free account. And a 350% growth in firms subscribing to the website – seemingly reflecting progress made during the initial months of the pilot.

They also reported increased numbers of legal service consumers engaging with reviews, including its first recorded day where 1,000 new reviews were published. And confirmed one of the drivers for this increase being '...due to the engagement from law firms joining the platform and then showcasing their online reviews to clients.'

As above, other factors such as the digitising impacts of the pandemic may have played a part in increasing engagement rates. However ReviewSolicitors confirmed its data has been adjusted to account for the pandemic's impacts.

Michael Hanney, Chief Executive for ReviewSolicitors, said:

'The pilot scheme was a superb initial catalyst for engaging law firms in review collection. ReviewSolicitors saw a significant increase in the organic number of law firm enquiries in the first six month period of the pilot scheme. Having regulators recommend law firms engage with online reviews has helped forward-thinking firms take the step to begin collecting and showcasing feedback from all their clients.'

## Our evaluation of online reviews as a quality indicator

### **Consumers benefit from engagement by legal service providers with reviews**

Many people routinely use online reviews to inform decisions in their lives, and increasingly expect to see reviews of businesses they use. Evidence shows the consumer journey in legal services is evolving. And the LSCP's tracker survey for 2022 confirms that numbers of people shopping around for legal services are significantly increasing.

Online reviews may be an important part of this as they provide digital tools for consumers at the point of entry into the marketplace. And help them make decisions about providers based on experiences and feedback from many other people.

Ninety two per cent of Consumer Research 2 participants agreed that review websites are helpful for people needing to find legal services. At least 91% cited customer reviews as an important quality indicator to see on law firm websites.

Law firms in the pilot confirmed increasing numbers of prospective clients now get in touch after firstly reading their reviews. If more providers engage with review websites, it is reasonable to conclude that use of online reviews as a quality indicator will continue to grow.

### **Legal service providers should proactively engage with online reviews**

Pilot law firms described seeing commercial benefits from engagement with online reviews – including some of the smallest firms who see increased contact from consumers as a direct result of online reviews published about them. As more consumers shop around for legal services, online reviews are increasing influential. Some providers already respond by building them into their marketing approach. Challenges remain – for example, where reviews appear to not be written by clients. However DCTs are evolving their processes in response, including equipping all providers with free-to-use features – such as tools enabling reviews to be replied to, or for fake reviews to be removed ([example from ReviewSolicitors](#)).

### **Targeted action by regulators helps to build this quality indicator**

Data from review website providers showed that promotion of the pilot and its focus on online reviews encouraged some providers to start engaging with online reviews. Although Covid-19 may have had some impact, feedback from DCTs confirms the impact that targeted approaches from regulators can have.

We saw good levels of interest from providers in information products published by regulators. Our promotional activities were generally well-received, with one example being strong engagement rates achieved by the February 2021 webinar. We have seen good appetite from providers to hear from their regulators about online reviews.

Our activities with consumers also showed good public appetite for information to help them compare legal service providers. Our targeted advertising demonstrated approaches that regulators can take to proactively get those messages in front of consumers. And that help build the strength of online reviews as a quality indicator.

# Comparison websites

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## What we did

We explored the role played by other websites (besides online review websites) in providing access to legal service quality indicators. For our evaluation we are distinguishing comparison websites from online review websites, although we recognise that some DCT platforms offer comparison tools alongside online reviews.

## Consumer perspectives

### General influence and use

Using websites to compare prices and shop around is well-established in some regulated sectors. This includes financial services where big-brand websites compete for millions of customers.

In the communication service sector, [Ofcom's research](#) shows over one in four UK consumers use price comparison websites. Product comparison sites such as [Google Shopping](#) and [PriceRunner](#) provide tools to compare prices. But comparison websites in other sectors focus on contrast through other factors, including:

- The Care Quality Commission's '[Find and Compare Services](#)' tool for health and care services
- UK Government's tool to [compare schools](#).

### Comparing legal services

Demand for legal services is generally high, with [research](#) showing 7.5 million adults per year experience a legal issue. The LSCP's Tracker Survey 2022 reports growing numbers of consumers shopping around for legal services, suggesting good conditions for comparison websites.

However, only 24% of participants in Consumer Research 1 were aware of comparison websites for legal services. And only 41% of those people had used one before - less than 10% of total participants.

## Legal service provider perspectives

### Engagement with comparison websites

Most law firms in the pilot told us they do not engage with comparison websites. Only one participant in our survey with the Access Group's members confirmed current engagement with a price comparison site. Respondents to the survey felt that:

- legal services are difficult to price accurately before meeting prospective clients
- transparency requirements from regulators already ensure price information is available to consumers to help them compare providers
- comparison websites represent a 'race to the bottom' with price prioritised over quality.

Some DCTs in the pilot, such as the Law Superstore and reallymoving, are legal service comparison websites. However, multi-sector comparison websites are almost totally absent from the legal service comparison space. Big-brand comparison website providers were

invited to participate in the pilot but did not take part. Representatives from USwitch explained the challenge of scaling and commercialising legal service comparison, given the infrequency of consumer interactions with legal services.

## Pilot activities

### **Encourage providers to engage with comparison websites**

Law firms in the pilot were asked to visit the pilot DCTs' websites and consider engaging with them, including comparison websites such as the Law Superstore. Some firms explained they were not comfortable or geared-up to provide prices to comparison websites. Others were uncertain about potential conflicts between comparison website operations and regulatory requirements, such as requirements around advertising.

The SRA updated its [guidance](#) in response to concerns raised by solicitors, and relaunched and promoted it to solicitors during the early stages of the pilot.

In July 2021 the operator of the Law Superstore and reallymoving platforms reported that engagement from legal service providers had increased by a factor of two. This was compared to the previous 12 months. During this same period, engagement by consumers had also increased by a factor of five.

### **Encourage consumers to use legal service comparison websites**

We launched a '[Compare DCTs](#)' interactive tool on the SRA's website. It lists the pilot DCTs and provides ways for consumers to compare them and select platforms to help them search for legal service providers.

In early 2022 we ran a social media campaign with members of the public who had indicated some interest online in conveyancing, or in employment law. The campaign used Facebook and Google Display Ads to direct members of the public towards the tool.

The adverts generated 50,000 visits to the tool and represented good value for money compared to typical advertising rates seen for the legal services sector. People using the tool appeared to actively engage with the content, with the average visitor staying for more than 40 seconds, and many a lot longer. More than a fifth (22%) of visitors who actively used the tool went on to visit the website of a featured provider. And 52% of visitors who filled in a feedback survey said they found the tool useful. The most popular website visited by people using the tool was the price comparison website, the Law Superstore.

## Our evaluation of comparison websites

### **Increased rates of shopping around may increase demand for DCTs that provide prices alongside quality indicators**

Comparison websites for legal services support consumers to compare prices and quotes, but, currently, not much comparable information about quality. We did not see significant levels of interest or interactions from providers or consumers with them, although the Law Superstore and reallymoving report increased engagement.

For consumers this does not follow trends in other professional service sectors where people are routinely using them in large numbers. Only a small number of comparison websites currently operate in legal services. And we saw no indication that big-brand comparison websites would be likely to start operating in the sector.

However, with shopping around for legal services increasing, demand for comparison websites and DCT platforms that combine price comparison with tools to compare quality indicators – such as online reviews – may still increase.

Some DCTs described longer-term strategies to become one-stop-shop destination sites for consumers. DCTs like [Legal Utopia](#) and [JustBeagle](#) already seeming to be moving towards this model.

Increased consumer demand for comparison websites may over time spur more providers to engage with them. However, this may not automatically improve consumer access to quality indicators. Unlike online review websites, price comparison websites tend to list firms who subscribe to their platform. This gives subscribing providers a degree of influence over categories of comparable information that are published about them.

If, for example, subscribing providers did not support a particular quality indicator being added onto a comparison site, they could exert influence on the DCT provider not to do so. This was something that we identified during the pilot. These are considerations that should be monitored by regulators as DCTs evolve, and new DCTs potentially emerge.

### **Targeted action by regulators could help to grow the profile of comparison websites, as a tool for accessing quality indicators, over time**

While our research showed low current levels of awareness and use of legal service comparison websites, targeted advertising of the ‘Compare DCTs’ tool indicated good levels of consumer interest in them. It is also important to note that our research finds consumers are more likely to use DCTs for legal services once they are shown them. And data from the pilot shows increasing engagement by consumers with price comparison platforms. This suggests there may still be a role for regulators here.

Factors preventing big-brand comparison sites from offering legal service comparison on a large scale are unlikely to change. However, encouraging more providers to consider engaging with existing legal-service specific comparison websites could still be an important part of an approach towards quality indicators. Or DCTs that may in the future evolve to combine more price comparison opportunities packaged alongside indicators.



# Regulator and DCT relationships

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## What we did

We trialled activities to understand future relationships that regulators might have with DCTs as part of any longer-term approach for progressing quality indicators.

## Consumer perspectives

The CMA published a [final report](#) from its study of DCTs in 2017, touching on legal services alongside other sectors. The report confirms people have mainly positive views and experiences of DCTs but need to trust them in order to use them successfully. It states: 'Regulation should support all these factors in a proportionate way, if the market does not deliver them on its own...', and recommends developing frameworks to ensure DCTs are clear, accurate, responsible and easy ('CARE') to use.

It called for regulators to:

- work together to ensure consistency of approach towards DCTs
- work with DCTs and suppliers to mitigate 'hollowing out' risks (a reduction of product quality because of undue focus on price)
- communicate key messages to consumers about DCTs.

The CMA also asked for regulators to communicate to consumers the following:

1. Use comparison sites to save time and money
2. Choose carefully between comparison sites
3. Try more than one if possible
4. Check how sites order their results.

Citizens Advice explores accreditation schemes for DCTs operated by regulators in its report '[The real deal: how do price comparison websites measure up?](#)' It confirms that, while accredited websites seem to perform better on a number of criteria than non-accredited ones, consumer awareness of schemes is low. It concludes that 'accreditation appears to be an answer to a question that consumers are not asking.'

It suggests regulators cooperate to address cross-sector challenges in this area together, suggesting consideration of 'trust mark' accreditation schemes as foundations for regulator / DCT relationships.

In Consumer Research 2 we asked how important it is that legal service review websites follow an agreed code of practice. And 94% confirmed they think it is important.

## Perspectives from other regulators

### Financial services

DCTs are well established in the UK's financial services market, including comparison brands like [MoneySuperMarket](#) and [Confused.com](#).

Firms operating comparison websites that provide quotations for regulated financial service products are subject to regulatory requirements. They feature in the Financial Conduct Authority (FCA)'s regulatory framework and are authorised as a UK [insurance intermediary](#).



Other DCTs that do not require FCA authorisation, including review websites, remain influential through their publication of financial service quality indicators. This includes websites such as [Smart Money People](#), [Feefo](#), and [Trustpilot](#).

## Energy

We met Ofgem to discuss its [Confidence Code](#). It underpins a voluntary accreditation route for DCTs operating in the UK energy market. Accreditation is free and Ofgem reported 10 DCTs are accredited, although several 'big brand' DCTs in the sector are not.

The accreditation process requires ongoing resource commitment from Ofgem, although this seems relatively modest. Ongoing requirements include annual audits of DCTs, and Ofgem's team can specify steps required to secure ongoing accreditation, issuing notices to accredited DCTs and ultimately removing accredited status if required. Ofgem also handles consumer complaints about accredited DCTs, in-line with the Code's requirements.

## Communications

We met with Ofcom to discuss its [voluntary accreditation scheme](#). DCTs describe their operations for Ofcom to audit and, once accredited, they may publish the 'approved by Ofcom' logo and promote their accredited status. Accreditation is free and DCTs must cover a substantial part of the communications market. There are six accredited participants in the scheme.

Complaints about accredited DCTs can be heard by Ofcom, and accredited ones are required to link to information resources on Ofcom's website, such as broadband speeds. They must also provide offline methods of allowing customers to compare providers.

## Pilot activities

### Voluntary code of conduct for DCTs

At the start of the pilot we published a voluntary code of conduct for DCTs operating in the legal services market on the [SRA's website](#), [CILEx Regulation's website](#), and the [CLC's website](#). It draws on the LSCP's [good practice standards for comparison websites](#), and elements of the CMA's 'CARE' framework.

We asked DCTs to 'sign-up' to the code's requirements for the duration of the pilot and / or provide feedback on it. The Code helped to underpin our engagement with DCTs during the pilot. And DCT's that had agreed to follow it expressed interest in promoting their affiliation to the Code in some way.

### Information about DCTs

We launched a [DCT information hub](#) for legal service providers to access information about DCTs participating in the pilot. This included [DCT video clips](#), and we recorded good levels of interest and engagement from providers. The [clip provided by ReviewSolicitors](#), for example, received 579 views (as of 1 February 2023).

### Engage with regulators and DCTs

We met with participating DCTs and convened roundtable discussions with them. This included engagement between DCTs, the regulators and the LeO on regulatory data and complaints data. In addition, we met DCT providers not participating in the pilot to discuss their perspectives on the legal services market and quality indicators. This included:

- Google, regarding its [‘Google Business Profile’](#) tool
- [USwitch](#), supporting our exploration of big-brand operators in other sectors
- bespoke quality indicator tools for legal service providers, including [The Conveyancing Map](#).

## Our evaluation of DCT and regulator relationships

### **Proactive engagement between DCTs and regulators is good for consumers**

DCTs are an important mechanism for consumers to access quality indicators. They increasingly are helping to improve access to legal services, and to ease comparison between providers. Our research shows consumers being more likely to use DCTs once they become aware of them, and the LSCP’s Tracker Survey 2022 shows consumers increasingly shopping around.

DCTs are unquestionably an important feature of the legal services market. Continued engagement between regulators and DCT providers can focus on building awareness with consumers. And trust and confidence to use DCTs to find and compare legal services.

### **DCT accreditation does not seem appropriate for the legal services sector, and a voluntary approach offers similar advantages**

Our exploration of approaches from different sectors helps us see what might, and might not, work well for the legal services market. Legislative hooks do not currently exist in the legal services sector, so legal service regulators instead rely on DCTs consenting to participate in voluntary arrangements.

Voluntary accreditation schemes provide frameworks for regulators and DCT providers to engage, and with relatively low resource costs for regulators. With small numbers of DCTs currently operating in the legal services sector, we might secure good numbers of participants in a DCT accreditation scheme. There was also enthusiasm expressed by many of them to engage with us. Operational resources required to run an accreditation scheme could be coordinated across legal service regulators.

However we did not identify significant benefit for consumers from accreditation. Many DCTs choose to operate outside them in other sectors. And our pilot activities show it is possible to secure good engagement with them and build consumer confidence to use them, in other ways. We have concluded an accreditation scheme is an unnecessary step for the legal services sector.

Our trial voluntary code of conduct was relatively simple and supported engagement with DCT providers by setting expectations and a framework for addressing concerns between regulators and them.

Some DCTs are enthusiastic to remain party to voluntary arrangements. We think this approach can help to articulate good standards for DCTs in the sector. And also provides a foundation for improving consumer and legal service provider trust and confidence to engage with DCTs.

# Objective, trusted data

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## What we did

We explored the use of information collected by independent, trusted bodies that might be helpful for consumers when they are comparing the quality of legal services providers.

## Complaints data and regulatory information

Complaints data and regulatory information are used as quality indicators for members of the public in some regulated sectors, including:

- searchable data published by Ombudsman services about their decisions – for example, in [financial services](#)
- summaries of decisions published by regulators - for example, in [medical services](#)
- regulatory information and provider performance ratings – for example, in [care services](#), and data for [comparing schools](#).

The LSB's research, '[Quality indicators in legal services](#)', reports mixed views from the public about the perceived helpfulness of legal service complaints information. Its Public Panel ranked complaints data at the 'less helpful' end of quality indicators, and, while some people acknowledged its value and were enthusiastic to know more, other quality indicators were held in higher value.

## Complaints data pilot activities

### Encourage DCTs to republish Legal Ombudsman information about complaints

Some DCT's in the pilot access and republish data from legal service regulators, including the SRA's [API service](#) and the CLC's [data for comparison websites](#). However, this does not appear to be the case with information published by the LeO. Only Solicitor.info confirmed it uses Ombudsman decisions, while ReviewSolicitors had previously done so.

We invited the LeO and the participating DCTs to a roundtable meeting. However, DCTs were hesitant to republish Ombudsman decisions, citing concerns about:

- the 12-month publication period for Ombudsman decisions, which can discourage DCTs from republishing them and potentially limits their appeal to startup DCTs
- complexity in layering Ombudsman data over data from the legal regulators, and in ways that minimise duplication or errors between those datasets
- contextualisation of Ombudsman decisions for browsing consumers, and the challenge of explaining at-a-glance what they actually mean as a quality indicator.

Price comparison websites explained some of the deterring impacts of LeO decisions for legal service providers. This included some providers being reluctant for Ombudsman decisions to be published as part of their profile. Other DCTs however were still enthusiastic, with review websites in particular expressing interest in potentially linking providers to their complaints record as part of longer-term strategies.

## **Encourage providers to publish Legal Ombudsman information**

We asked legal service providers to publish information about LeO complaints on their website during the pilot. And to summarise numbers (if any) of Ombudsman decisions published about them in the previous 12 months.

Two providers successfully trialled the publication, but others were less willing to do so. Some reported being unable to complete the trial within the pilot's timeframes due to resource constraints, or commissioning processes for new website content.

## **Explore consumer interest in complaints data**

Participants in Consumer Research 2 rated the importance of different quality indicators and information about legal service providers. They were asked to review fictional DCT pages that included LeO information about a fictional provider.

Around 40% of participants confirmed they would compare providers using the Ombudsman's data. And 70% confirmed the LeO's data as important on a DCT's page and that it would help them decide whether or not to choose a specific provider. LeO decisions were rated overall as being more important than the other area of official data we asked about, which was HMLR data.

We also engaged with the Legal Choices project team to explore the development and launch of its ['Disciplinary and regulatory records'](#) tool. This allows users to see all published summaries of decisions from legal service regulators and the LeO in one place for legal service providers.

## **Our evaluation of complaints data**

### **Consumers are interested in using complaints information as a quality indicator**

The LSB's public panel finds relatively low levels of interest in complaints information (compared with other indicators). However around 40% of participants in our consumer research would use it to compare solicitors through DCTs.

Participants rated other indicators more highly, such as star ratings. However, around 70% of the participants still felt the information was important to see on provider profile pages on DCTs to help them choose providers. And around the same proportion deeming it important to find on provider's own websites.

Consumers need context in order to successfully use Ombudsman decisions as a quality indicator. Consumer Research 2 found they are interested in seeing numbers of complaints as a proportion of cases dealt with, and the nature of complaints being made.

DCTs agree that contextualisation is crucial, and integral to any successful republication of Ombudsman decisions. This means that how complaints data are published is just as important as where.

### **DCTs are unlikely to republish Legal Ombudsman decisions without more work**

We found little evidence of DCTs republishing LeO data. However some remain optimistic about republishing complaints data as part of longer-term strategies. Legal service regulators can support this through continued engagement with the LeO and DCTs. And

exploration of increased harmonisation of datasets – an approach with working precedents through the Legal Choices tool.

### **Voluntary regulatory approaches will not significantly develop this quality indicator**

Our trial activities show low provider interest in voluntarily publishing information about their LeO complaints record. As DCTs also currently face barriers, legal service regulators will need to consider regulatory approaches to make further progress.

A regulatory approach could require providers to start publishing or connecting with current published Ombudsman decisions from their websites. In this way, LeO decisions might firstly become more visible and accessible as quality indicators through provider's own websites – something found by our research to hold value with many consumers - while work with DCTs continues. Regulators could also continue to raise public awareness of the Legal Choices tool.

### **Conveyancing data**

Lawyers working in the conveyancing sector help thousands of consumers each year to manage the legal mechanisms required to buy, sell or re-mortgage property. We engaged with HMLR early in the pilot and studied [data](#) it publishes about conveyancing lawyers and their businesses during land transactions.

This includes 'price paid' data about properties and about [requisitions](#) where HMLR contacts a conveyancing lawyer about an application. This can help to indicate the accuracy of the lawyer's work.

HMLR data are independently collected and represent a trusted source of information. As all conveyancing transactions in England and Wales have to be progressed through HMLR, we explored opportunities for its data to be used as a quality indicator.

We also engaged with DCTs about different types of conveyancing data, including:

- information about numbers of conveyancing transactions handled by legal service providers
- the geographical location of a provider in relation to properties that they provide conveyancing services for.

### **Conveyancing data pilot activities**

#### **Explore consumer interest in HMLR data**

We asked participants in Consumer Research 2 to view a fictional DCT page featuring a range of quality indicators and information about a fictional conveyancing provider. This included a representation of HMLR data, and some explanation of the data and what they mean.

Just over half (52%) of participants viewing the fictional DCT and firm pages found the HMLR data to be important. Around a fifth (22%) of those respondents confirmed they would use these data to compare conveyancing providers. While these numbers were modest we heard suggestions from participants about ways they might use it.

## **Encourage DCTs to republish HMLR data**

DCTs participating in the pilot included reallymoving, a website for home movers providing quotes and information from businesses in the property sector. Other participating DCTs, including review websites, provide quality indicators about conveyancing providers.

However, HMLR data are not being republished on those platforms. We saw evidence of the [Conveyancing Map / Conveyancing Analytics](#) platform successfully doing so. This provides services to conveyancing providers to connect their prospective clients to comparable HMLR data and other quality indicators.

We explored HMLR data republication with DCTs. None of the participating DCTs went on to republish them during the pilot, although some envisaged a potential future role for the data in their platforms. Reluctance centred on concerns about the challenges of explaining the data in ways that would make it comparable information for consumers.

## **Encourage legal service providers to publish HMLR data**

We asked legal service providers to retrieve information from HMLR about their firm, including requisitions data, and to trial the publication of these data on their websites. Two providers trialled the publication, but others confirmed they would not be able to do so within the pilot's timeframes.

## **Our evaluation of conveyancing data**

### **Contextualisation of HMLR data is crucial, and engagement with HMLR is creating routes for this to happen**

Through our engagement with HMLR, we identified requisitions data as having good potential as a quality indicator. While data is publicly accessible from [HMLR's website](#), there is currently little context available alongside it for members of the public to understand it or use it as a quality indicator.

Our activities with providers indicate that, while they or DCTs could republish, the real challenge lies in making the data meaningful and accessible as a quality indicator.

Participants in Consumer Research 2 ranked ten quality indicators in order of importance, including HMLR data which ranked ninth. However, some participants expressed interest in further information about HMLR data. This included opportunities for data to be provided in comparable formats and with clear explanations about what it means.

Products like the Conveyancing Analytics platform support some providers already to display data that are held about them by HMLR, so that prospective clients can consider them. However, directing consumers to consider the data by themselves on HMLR's website is not viable. HMLR confirms that its data in their current format is suitable for business and professional use, rather than by consumers.

Some consumers may welcome digital approaches allowing them to look quickly across a number of conveyancing providers and compare HMLR data. The regulators are working with HMLR to assess opportunities to improve access to its data for third parties, including consumers.

'For the percentage about the Land Registry having to request further information, I would like to get a sense of how that compares with other solicitors' A research participant

# Employment law quality indicators

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## What we did

We explored quality indicators for employment law through the pilot. This was to better understand where DCTs and other existing routes into the legal services market may already be supplying them, and consumers feelings about them.

We engaged with HMCTS to explore potential sources of trusted, official data about providers in the employment tribunal space. While some data are recorded and published we were unable to locate a realistic proxy to indicate the quality of employment law legal representation and advice.

We also engaged with stakeholders such as the Employment Lawyers Association, and providers in the pilot, and heard about the influence of skills, credentials and specialisms. And how these operate as quality indicators for consumers looking for help with employment problems. We decided to explore these areas through our pilot activities.

## Pilot activities

### Explore specialisms as an employment law quality indicator

Employment problems hit hard and can impact people's financial stability as well as their physical and emotional wellbeing. Citizens Advice helps people with [almost 600,000 employment problems each year](#), and describes the Employment Tribunal process as '...dauntingly legalistic and adversarial..'

Effective legal representation and good quality technical advice are important to help resolve disputes between employees and employers. But legal service providers also help people to get their points of view heard and gain closure and a way forwards out of difficult situations. Pilot law firms described the importance placed by many of their clients on the 'human' side of their services - demonstrated by the ways they showcase their areas of expertise.

Some providers told us that, in practical terms, this leads to consumers contacting them wanting to talk to a specific individual at the firm after firstly reading about them online. This was often through review websites.

We explored specialisms in Consumer Research 2 by asking participants to review a fictional DCT landing page to help them find a provider for help with an employment issue. This displayed a number of quality indicators and 96% of participants confirmed that knowing specific areas of law a firm specialises in is important when they are choosing a provider. They rated it as the most important from the list of quality indicators they could select from.

### Encourage providers to publish employment law quality indicators

We asked employment law firms in the pilot to publish information about areas of specialism, and proportions of their cases that were settled before or during tribunal. Some providers felt these data were problematic to collect and maintain, particularly for smaller businesses. One provider likened it to 'red tape' with questionable value for consumers, given the potential for providers to manipulate or over-estimate their own information.



## **Explore star ratings as an employment law quality indicator**

We explored star ratings for employment law providers through Consumer Research 2. These are a type of rating scale typically presented as symbols, commonly shown as a number of stars. They are used by reviewers to rank specific things, and to communicate that ranking at-a-glance to members of the public.

Participants reviewed a fictional DCT landing page that listed fictional employment law firms and their ratings. Star ratings and numbers of reviews were confirmed as important to around 90% of the participants.

## **Our evaluation of employment law quality indicators**

Our engagement with HMCTS and the Employment Lawyers Association suggests no independent source of trusted data exists for employment law that serves as a reliable quality indicator. We did not identify data that DCTs or providers could republish from, or that has an equivalent standing to HMLR's data for conveyancing.

However, regulators can still take other steps to improve employment law quality indicators. Our evaluation shows other indicators are particularly influential for consumers in these areas. Some of these are indicators that are influential to consumers across most areas of the regulated legal services market - like star ratings, and reviews.

We also saw information about provider specialisms and specific areas of employment law was particularly valued by consumers. This is important to note for future approaches regulators might choose to take to build access to, and awareness of, quality indicators. And in areas of law where trusted, independent data sources do not exist.



## Other legal services

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Consumer Research 1 found consumers taking different approaches to look for providers, depending on the type of legal service they are in the market for. For example, we found the most common first step for consumers looking for conveyancing services is to contact a provider they have used before.

The most common first step when looking for legal support with employment issues is to contact their trade union or a professional body. Meanwhile we found the most common first step for consumers with family law issues is to start searching online.

We also found those looking for family law services are more likely to look at multiple options to find information about providers, compared to conveyancing or employment law services.

These are important considerations that help us understand different routes people use to enter the legal services market. And the quality indicators that may then be particularly important in helping them shop around and depending on the legal service they are looking for.

Our research showed people searching for family or employment law providers found it more difficult to compare providers than people looking for a conveyancing provider.

In any future approach that regulators take, it will be equally important to consider specific areas of legal service where consumers might benefit from better access to specific indicators. This is alongside 'one size fits all' approaches that may benefit consumers across multiple areas of legal service.

This is also relevant to future engagement approaches with DCTs. Platforms like Legal Utopia, the Law Superstore and Search4Legal provide comparison services across many areas of the marketplace. While online review websites cover the full spectrum of consumer experiences across all areas of law.

However, we may wish to discuss particular indicators that have strong influence or are unique to certain types of legal services. This will help us understand how DCTs may be able to support consumers to access them.

## Next steps

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Our evaluation helps us understand what future approaches might be for legal service quality indicators. We found some indicators ranking more highly than others with consumers, and some which consumers cannot easily access without some intervention by regulators.

There may be other indicators that we have not yet identified or considered at all, including other sources of trusted, official data in different areas of legal services. There is potentially much more that can be done.

Targeted work to continue progressing quality indicators is timely, with significantly more consumers now routinely shopping around for legal services. The requirements for regulators in the LSB's policy statement on consumer empowerment help to confirm the shape of our priorities. And our evaluation shows we are well-positioned to make progress. This includes taking action to respond to the CMA's recommendations for legal service quality indicators, by acting to influence and positively impact their availability and accessibility.

Moving ahead, we will engage with other legal service regulators, the LSB, the LSCP and the LeO to discuss proposals for action. We see an important role for the LSB's [Market Transparency Co-ordination and Oversight Group](#) (MTCOG) to underpin next steps for quality indicators. And to help co-ordinate future action by regulators with ongoing input from the LSCP. Insights from the Bar Standards Board (BSB)'s pilot on quality indicators may also inform this.

We also think it will be important, where relevant to do so, to connect our work on quality indicators with other existing cross-regulator groups. This includes the Regulators Research Forum, the Legal Choices Steering Group, and MTCOG's PLE-focused group.

There are other areas of focus that we have yet to explore in any significant way, but that we think are important and engagement will form part of our next steps. This includes non-digital access to quality indicators and exploration of responses to digital exclusion.

We will continue engagement with DCTs and other stakeholders to share outcomes from our evaluation, and to discuss next steps. We have made the case here for:

- introducing mechanisms to underpin longer-term relationships with DCTs
- maintaining the relationships developed through the pilot
- building an approach to secure them for the future.

### High level actions for quality indicators

The following actions will help regulators meet relevant requirements from the LSB and respond to the CMA's calls for action on legal service quality indicators. They will make sure important legacies are maintained from the pilot's trial activities, while also creating a foundation for future approaches to quality indicators.

Regulators will consider specific areas of focus that could be taken forward under each action point. Some of these may be collaborative, and we will discuss them with stakeholders through the MTCOG and other channels. This is well as continuing engagement with the BSB on outcomes from its pilot.

Individual regulators may also publish their own response to the recommendations to describe plans for progress within their respective regulatory frameworks.

**Action 1**

Use targeted activities with consumers to improve their access to, and use of, comparable information about the nature and quality of legal services and DCTs.

**Action 2**

Explore options to increase legal service provider engagement with DCTs or online reviews.

**Action 3**

Establish ongoing regulator-led voluntary guidelines for DCTs that provide assurance to legal service providers and consumers about the standards DCTs have agreed to adhere.

**Action 4**

Investigate and monitor the impact of information that may help consumers compare providers in specific areas of legal services. This includes identifying other potential sources of independent, trusted data for legal services, and exploring opportunities for those data to be used as comparable information.

**Action 5**

Explore opportunities and regulatory levers to improve the accessibility and availability of Legal Ombudsman decisions for consumers.

**Action 6**

Continue engagement with HMLR on opportunities to improve consumer access to its data.

**Action 7**

Explore digital exclusion considerations and opportunities for regulators to influence the availability of comparable information through non-digital channels.