

OFFICE FOR LEGAL COMPLAINTS

BUSINESS PLAN AND BUDGET 2024/25
for the Legal Ombudsman

About the Legal Ombudsman

The Legal Services Act 2007 (the Act) established the Legal Ombudsman scheme (LeO) and the Office for Legal Complaints (OLC) to administer it. The Act also established the Legal Services Board (LSB) to oversee the regulation of the legal profession in England and Wales. Both the OLC and the LSB are Arm's Length Bodies of the Ministry of Justice (MoJ). LeO's work supports and aligns with the regulatory objectives.

LeO has two core roles. It resolves complaints about providers of legal services that haven't been resolved to customers' satisfaction – as quickly and informally as possible. LeO covers the majority of legal services provided in England and Wales. The rules and limits about what complaints LeO can help with are set out on LeO's website.

The second vital part of LeO's work is sharing learning and insight from the complaints it sees. This promotes better complaint handling, prevents future complaints and helps drive higher standards in legal services.

The Legal Ombudsman's work in 2024/25

2024/25 is the first year of work under the Office for Legal Complaints' 2024-27 Strategy for the Legal Ombudsman.

Building on the improvements LeO has already made in improving the experience of consumers and legal service providers, it expects to resolve around 8,400 complaints across the range of legal services it covers – with half resolved through early resolution.

2023/24 so far

Improving customers' experience

In the year to date, LeO has continued to improve customers' experience – building on previous years' progress:

- So far in 2023/24 (as at the end of Q3) 45% of all cases have been resolved within 90 days. In 2021/22, 80% were taking more than 180 days.
- The half of LeO's customers whose complaints have been resolved through early resolution could expect, on average, to get an outcome within 60 days – with no waiting time at all from the point LeO has all the information it needs to determine it has jurisdiction.
- LeO has made a sustained reduction in the number of people waiting for an investigation – and anticipates a 30% reduction by the end of the year.
- LeO expects to end 2023/24 within its Business Plan forecast ranges for resolved complaints .
- The profile of the queue has changed significantly. At the queue's peak in 2022, customers could expect to wait up to 16 to 24 months before their complaint reached an investigator. The half of cases that are resolved by early resolution now have no wait time. For the half needing an investigation, by the end of March 2024 LeO expects the average waiting time in the queue to be 170 days for all case complexities: 50 days shorter than the 2022/23 average.

The OLC's 2023/24 annual report and accounts will give more detail about LeO's performance.

Growing demand and transitioning to new Scheme Rules

LeO has made these improvements against a challenging backdrop. After a period of relative stability, it has seen a sustained increase in demand. In the nine months from April 2023 to the end of December 2023, LeO has received more than 93,000 contacts – 13% more than in the same period last year – and a 3% increase in new customer complaints received via the website (from 7,072 at this point in 2022/23 to 7,283 in 2023/24 to date). This follows a 6.4% year-on-year increase in core demand from 2021/22 to 2022/23, which meant complaints were 8% higher than LeO's assumptions.

For operational purposes, core demand for LeO's service is defined as the number of cases accepted by LeO for resolution – either by early resolution or investigation – after jurisdiction checks have been completed by the general enquiries team. This doesn't necessarily reflect underlying, front-line demand for LeO – of which the best current indicators are the number of contacts LeO is receiving and the number of new complaints received.

Following the introduction of new Scheme Rules on 1 April 2023, for an initial period LeO has been carrying out upfront checks on all cases, to ensure the fair and reasonable application of discretion on whether to accept them. While the right approach, this has taken significantly more time and resource than originally anticipated.

This means that in 2023/24, core demand (as defined above) hasn't reflected the increase in underlying demand LeO has seen. With LeO needing to redirect investigator resource to the very start of its process for a limited time, there has been a slowing of the flow of cases.

LeO's intervention has now had the intended effect of increasing the flow, which LeO expects to continue into 2024/25. This is reflected in forecasts for an additional 600 cases to flow through across Q1 and Q2 of 2024/25, which in normal operational circumstances would have done so in 2023/24.

LeO's work in 2024/25

LeO's expectations for 2024/25 are that:

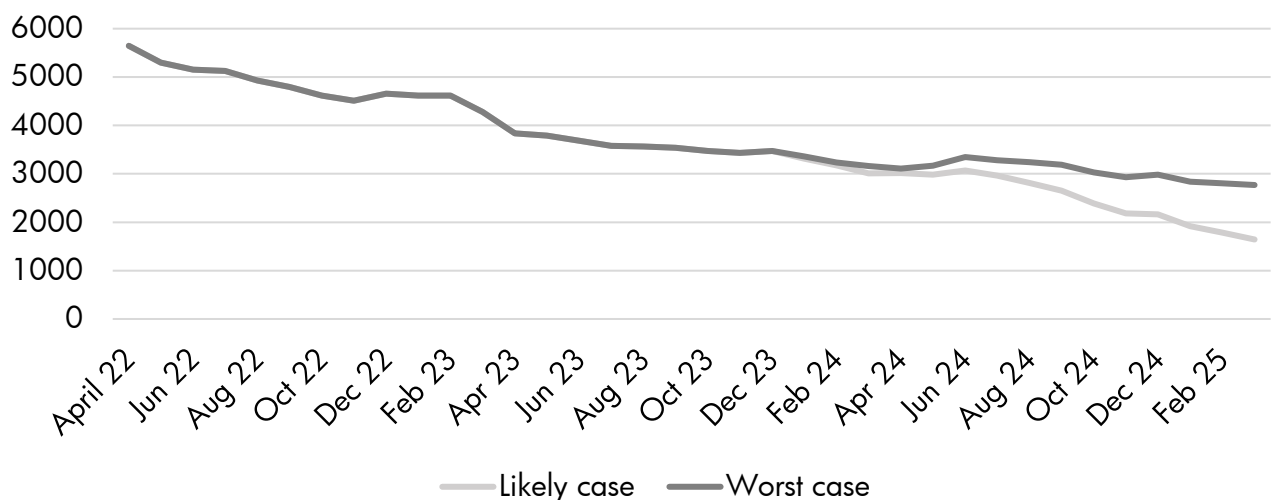
- **LeO expects to resolve 8,400 complaints.** This is 700 (9%) more than the forecast for 2023/24, and will be delivered without additional operational resource, with LeO absorbing a sustained increase in demand.
- **The queue will reduce by 40%, with around 1,650 cases remaining at the end of March 2025.** The trajectory for reaching a working level queue will extend over a longer period, into 2025/26, reflecting the balance LeO is aiming to strike between continuing to improve customers' experience and absorbing demand to minimise costs. There is more detail about this later in this document in the context of LeO's proposed budget.
- **By end of March 2025, half of complaints will still be suitable for early resolution, with no waiting time.** Including all cases, the overall proportion resolved within 90 days will continue to increase over this time.
- **By the end of March 2025, for all cases (combining those resolved through early resolution an investigation), LeO expects the average customer journey time to be approximately 145 days.** The forecast average wait time for most customers will be 60 days, followed by 85 days' resolution time for all cases.
- **By the end of March 2025, for the half of customers requiring an investigation, LeO expects the average customer journey time to be between 215 and 265 days for cases of all complexities.** This is made up of a forecast waiting time of around 85 days for all complexities to be allocated to an investigator, and between 130 and 180 days for resolution, depending on individual complexity.

The table and chart below show a range for how many complaints LeO expects to receive and resolve, and the number of cases in the investigation queue to the end of March 2025. Core demand is expected to be 15% lower than the headline figures in the table due to some complaints falling outside LeO’s time limits following Scheme Rule changes. Once this 15% reduction has been factored in, an additional 600 cases will be added across Q1 and Q2 to reflect demand delayed from 2023/24).

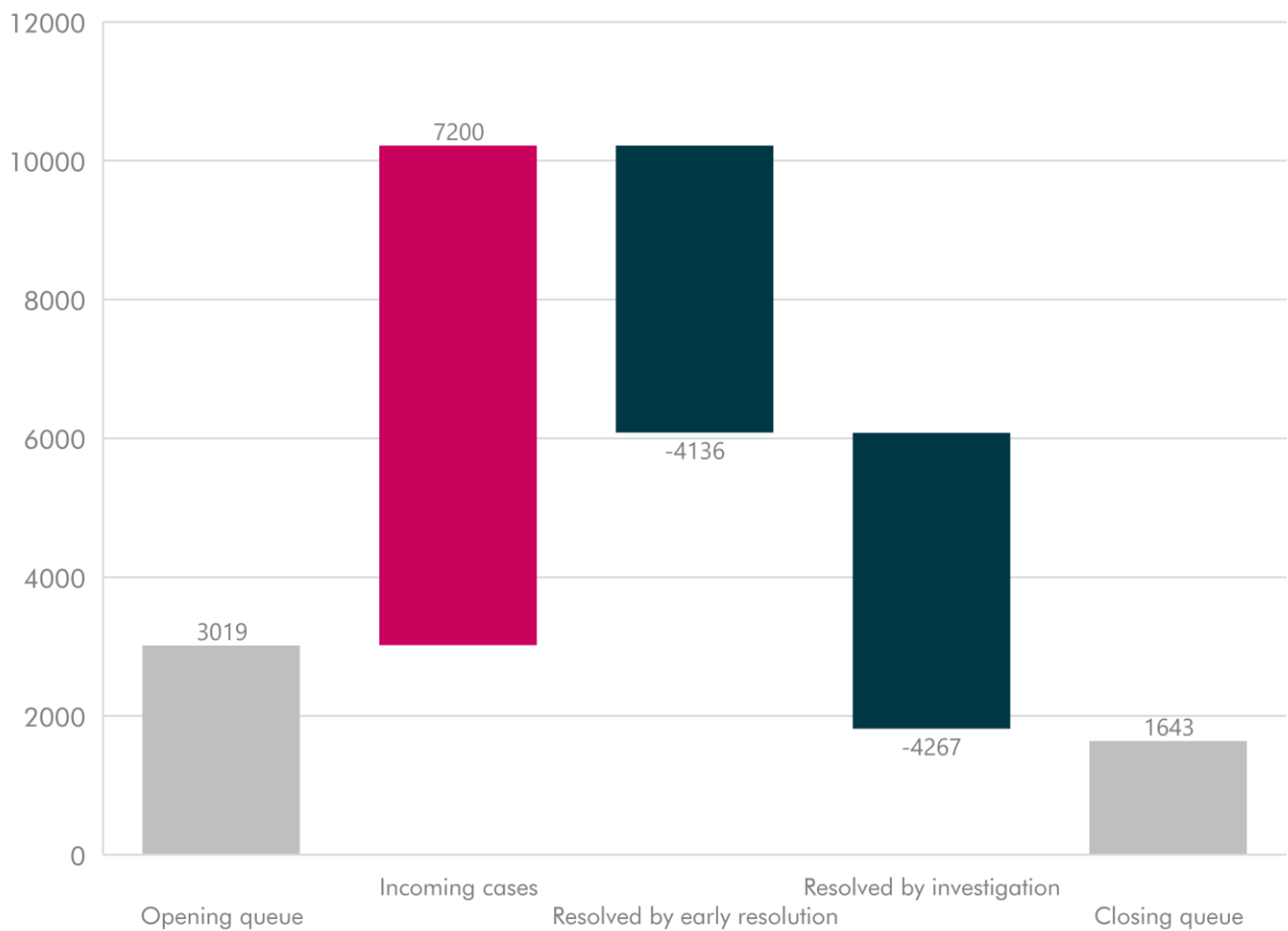
	Q1 2024/25	Q2 2024/25	Q3 2024/25	Q4 2024/25	Total	2023/24 latest forecast
Contacts	34,031	34,906	36,156	37,648	142,741	125,424
New complaints received*	2,720	2,720	2,720	2,720	10,880	10,364
New complaints accepted (core demand – likely case)	1,941 (+375 delayed demand)	1,941 (+225 delayed demand)	1,941	1,941	7,764 (+600 delayed demand)	6,958 – 7,308
Complaints resolved	1,859 – 2,015	2,002 – 2,178	1,875 – 2,049	1,966 – 2,162	7,702 – 8,404	7,508 – 7,707
<i>Resolved by early resolution</i>	977 – 1,030	1,018 – 1,074	935–986	993 – 1,046	3,923 – 4,136	3,851
<i>Resolved following investigation</i>	8872 - 984	982 - 1104	940 - 1060	9974 - 1118	3,778 – 4,267	3,612 – 3,856
Cases in the investigation queue (end of quarter)	3,344 – 3,071	3,185 – 2,655	2,980 – 2,161	2,769 – 1,643	2,769 – 1,643 –	2,856 – 3,172

*Forecast based on 2023/24 demand, adding 5% to reflect current trend. Underlying demand is subject to a number of variables and actual figures may be different.

Reducing the number of cases in the investigation queue (pre-assessment pool) - actual and expected improvements to March 2025



LeO's work in 2024/25 - likely case



Issues generating demand for LeO

LeO has identified a number of high-level factors that could generate changes in the number and nature of complaints it sees in the coming year and beyond. These include:

- **The quality of service providers' first-tier complaint handling.** 45% complaints LeO investigated in 2022/23 involved inadequate first-tier complaint handling. If service providers apply the learnings from past experience, fewer complaints should be referred to LeO. LeO is committed to playing a central role in supporting the LSB in its focus on this area and in identifying opportunities for improvement with sector regulators.
- **The size of the legal market.** Recent data suggests a mixed picture in terms of legal sector growth. Where growth areas align with areas of law that account for a substantial proportion of LeO's work, there could be a large impact on the volume of cases LeO sees.

- **Ongoing cost of living pressures on consumers and legal service providers.** This may cause parties behave differently if a dispute arises: for example, parties may be less willing to resolve complaints informally. There may also be an impact on the issues underlying complaints, such as consumers trying to remortgage in the face of higher interest rates, and greater use of 'unbundled' services as consumers look to reduce costs.
- **The adoption of technology.** The LSB has recently consulted on the use of technology to improve access to legal services, while the Legal Services Consumer Panel's annual tracker survey continues to highlight differences in consumers' perception of service received online versus face-to-face. Recent examples of cyber-attacks highlight legal providers' vulnerability to issues affecting third parties. The use of artificial intelligence may present opportunities for better services for some consumers, while excluding or causing detriment to others.
- **Delays in the wider justice system.** These could result in an increase in the number of consumers expressing dissatisfaction with the legal service they have received. The Ministry of Justice is looking at ways of reducing these backlogs, including a focus on increasing the use of online dispute resolution, including using ombudsman schemes. High-profile cases have highlighted the role of LeO in providing proportionate resolution to legal service issues such as disputes over costs.

Looking ahead, LeO intends to build its capability to analyse and capture the reasons underlying external demand – while having constructive engagement with regulators over the information LeO is already sharing with them. This is vital in realising LeO's ambition under the OLC's new strategy to increase its impact in supporting better outcomes in the legal sector (see next section).

Business Plan priorities for 2024/25

Strategic objective for LeO's service

LeO resolves complaints fairly and effectively, providing an excellent customer experience

We will deliver an efficient and proportionate service

This strategic aim is about how LeO delivers its service. It reflects LeO's commitment to resolve each complaint as informally as possible and at the earliest possible opportunity. It includes LeO's work to identify and make improvements and efficiencies, so it's increasingly efficient and provides good value for money. It is supported by LeO's work to promote learning from complaints, which helps ensure LeO only receives complaints where its input is really necessary.

In 2024/25 LeO will ...

- Respond to around 140,000 contacts, accept 7,700 new complaints, and resolve 8,400 complaints – making further progress toward delivering an excellent customer experience, and sustainably reducing the number of cases waiting for an investigation.
- Complete a 'lean' review, following work started in 2023/24. The review will involve full mapping of LeO's end-to-end process, in light of the significant and rapid shift to greater use of early resolution. The findings will help LeO identify areas of focus in its aim to further reduce customer journey times and improve customers' overall experience.
- Research, scope and engage with the legal sector and key stakeholders on potential changes to LeO's case fee arrangements, including how these could incentivise pragmatism in complaint handling and early resolution.
- Continue to seek opportunities to make LeO more agile and flexible in its processes and use of resources, engaging with key stakeholders about the scope and window for legislative change.
- Delivering efficiencies based on our review of our quality framework, including ensuring quality checks are proportionate and make best use of operational resource.

- Use the learning from quality assurance and customer feedback to help reduce levels of rework and reinvestigation – in line with a 'right first time' philosophy.
- Review manual processes across LeO's operations to identify opportunities for savings and efficiencies through better use of technology and automation.
- Review and benchmark LeO's use of technology, including the potential of artificial intelligence, against other organisations', as the basis for a strategy developing LeO's capabilities.
- Engage with our people around our future ways of working – ensuring we create office space that reflects best practice in supporting collaboration and productivity, helping LeO to provide an excellent service as well as value for money
- Continue to improve LeO's internal forums and channels for generating innovations and continuous improvement, based on previous success of putting LeO's people's ideas at the heart of our transformation. This will include widening the scope of these forums from queue reduction to innovation and transformation across LeO's work – including how everyone contributes to capturing LeO's insights into legal complaints.

We will give fair, high-quality outcomes that make a difference

This strategic aim is about *what* LeO provides – its standard of service and resolutions to complaints. It reflects LeO’s commitment to ensure every complaint people bring to us has a fair and reasonable outcome – and whatever that outcome, to ensure consumers and service providers have an excellent experience. It covers LeO’s internal quality assurance processes, as well as how it asks for and uses customers’ feedback to improve its service. It is supported by the insights and feedback LeO provides to the legal sector, aimed at ensuring legal providers give fair outcomes themselves, without consumers needing to come to LeO.

In 2024/25 LeO will ...

- Use feedback from customer satisfaction surveys, service complaints and external reviews to identify how we can improve our processes and customer service.
- Following our review in 2023/24, implement an agile quality assurance framework – enabling us to provide assurance that we are delivering high-quality service and fair outcomes to complaints. This will also generate efficiencies as set out under the next aim.
- Using the framework to identify areas of risk and or inconsistency across LeO’s processes, so we can put in place improvements.
- Use the results of internal quality assurance – both areas of improvement and examples of best-practice – to inform changes to LeO’s service and the development of LeO’s people.
- Ensure the way complaints progress through LeO’s process is robust and consistent, while flexible enough to support efficient and customer-focused investigations.
- Use customer feedback to ensure that all LeO’s customer communications are clear and accessible, contributing to a high-quality service.
- Identify best practice from other organisations providing services like LeO’s to identify how our service could improve.
- Work with consumer representatives, suppliers and other organisations to encourage more customers to provide feedback on the service they have received from LeO.

We will be accessible to everyone who needs us

This strategic aim is about *who* LeO delivers its service for. It reflects LeO's commitment to ensuring everyone who needs LeO's independent and impartial help is able to access our service. This includes whether and how people reach LeO in the first place, and how easily they're able to use our service to get their complaint resolved. It is supported by work to raise awareness of LeO under the OLC's second strategic objective.

In 2024/25 LeO will ...

- Continue to monitor the impact of our Scheme Rules on the accessibility of our service. This includes using data and quality assurance to ensure rules are applied fairly and consistently, irrespective of customers' background or protected characteristics.
- Work with the Legal Services Consumer Panel and others with an insight into consumers' experience to better understand who isn't using our service, why, and how we can address this.
- Further strengthen the support we provide customers in vulnerable circumstances, including training more of our team leaders, ombudsmen and our service complaints teams, and analysing the learning from complex situations we've responded to.
- Assess our existing customer communication channels and the potential to improve and develop these over the course of the strategy.
- Review LeO's website for further opportunities self-service and automation, freeing up resource for providing customers with additional support where this is required.
- Develop a customer service charter, setting out what customers can expect from LeO and what we need from them to resolve their complaints fairly and at the earliest possible opportunity.
- Participate in forums and best-practice networks focused on accessibility, vulnerability and equality, diversity and inclusion, sharing back insights to improve LeO's customer service.

Strategic objective for LeO's impact

LeO's independent voice and experience lead to improvements in legal services

We will build LeO's profile and impact as an independent voice for improvement

This strategic aim is about ensuring LeO's voice is heard. It reflects LeO's commitment to share our independent view of legal services – using the right platforms and channels to reach the people who need to know. It includes making the outcomes we reach more transparent, so they can help inform consumers' decisions about choosing and using legal services. This supports work under the OLC's first strategic objective to ensure LeO's service is accessible to everyone who needs it.

In 2024/25 LeO will ...

- Strengthen our engagement with legal service regulators – so we can effectively and constructively highlight areas for improvement, and build the strategic influence and impact of our work on the regulatory framework.
- Contribute insights and perspectives to the challenges set out in the Legal Services Board's *Reshaping Legal Services* strategy.
- Proactively seek opportunities to share our insights and experience through mainstream and specialist media – increasing awareness and understanding of our role.
- Make greater use of our powers to publish Ombudsman decisions in the public interest – while delivering a plan to further increase the transparency and impact of LeO's decisions, including the potential to publish them in full.
- Assess and begin to build the capacity and structures we need to deliver an expanded learning, insight and impact programme in future years of the strategy.
- Review and increase the forums and channels LeO uses to engage with its stakeholders, building on the mapping completed in 2023/24.
- Participate in legal, complaints and customer service-focused forums and networks to raise awareness of LeO's work and share insights and best practice.
- Contribute to policy discussions and consultations within and beyond legal services, where our unique insight can help shape better decisions.

We will share learning and insights that help lead to better legal services for consumers

This strategic aim is about how LeO helps raise the standard of legal services. It reflects LeO's commitment to understand what's causing the complaints we see, and ensure this informs improvements in services consumers receive. It includes how our systems, data and people help us to identify insights, and ensure these reach people who can take action. It covers the information we publish and learning opportunities we deliver to help this happen. It supports the OLC's focus on LeO's proportionality and efficiency, helping ensure LeO only receives complaints where its input is really needed.

In 2024/25 LeO will ...

- Increase the timeliness and frequency of information we share about recent themes and trends in complaints and notable decisions, working with stakeholders to identify the most effective formats and channels.
- Deliver an annual report of complaint trends, insights and recommendations relating to the legal providers responsible for the most complaints.
- Deliver in-depth insights into areas of legal services that our own intelligence and consultation with stakeholders identify as a priority.
- Improve the visibility of data, insights and resources we already provide and our understanding of how these are currently used.
- Assess the range and quality of data and intelligence we currently capture about our casework, to establish the action and investment needed in future years to ensure we deliver valuable and timely insights.
- Strengthen our internal insight and knowledge-sharing forums and channels, building on our work in 2023/24 to assess their effectiveness.
- Scope and begin to develop a knowledge and insight strategy for LeO in future years of the OLC's strategy.

We will use our experience to help legal providers improve their complaints handling

This strategic aim focuses on how LeO's insights can help improve how the legal sector handles complaints. It reflects LeO's commitment to understand the quality of legal providers' response to complaints, and to share what we're seeing to help them improve this. It includes how our systems, data and people help us to identify insights, and ensure these reach people who can take action. It covers the information we publish and learning opportunities we deliver to help this happen. It supports the OLC's focus on LeO's proportionality and efficiency, helping ensure LeO only receives complaints where its input is really needed.

In 2024/25 LeO will ...

- Use our unique insight to play a central role in the Legal Services Board's work around redress and first-tier complaint handling.
- Define what best practice complaint handling looks like in our experience, and assess the current picture in the sector to identify priority areas for action across the strategy period.
- Redesign our complaints-handling training and learning offer, with a blend of online and face-to-face opportunities that align with priorities highlighted in our casework.
- Pilot and evaluate targeted complaints-handling interventions with legal providers, building an evidence base for what works and the impact this can have.
- Engage with legal providers to explore options for funding this work sustainably, including how we could recover the costs of training to minimise the impact on the levy.

LeO's budget and resourcing plans

For 2024/25 the OLC's budget for LeO is £17.95 million, against £16.8 million in 2023/24 – a 6.95% increase. Inflation hasn't been applied as a blanket increase, but targeted to particular areas where cost pressures are known or anticipated. Of the proposed increase, 59% relates to a proposed pay award, and 26% to one-off exceptional costs.

Total revenue expenditure	£17,949,602
Salary expenditure	£14,430,156
Non-salary expenditure	£3,519,446
Pay remit	5%
Increase over 2023/24	6.95%
Case closures (likely case)	8,404
Cost per case	£2,136
Cost per person helped (total contacts)	£127

The key features of the budget are:

- An overall increase in staff costs of 7%. This predominantly relates to a proposed 5% pay award, as LeO continues to respond to challenges in attracting and retaining staff in a competitive jobs market. The award is based on a best estimate at this time of future government pay guidance.
- No further operational resource (see below).
- A small increase in overall staffing levels, relating to strengthening LeO's insight and impact capability and improving resilience in LeO's finance team.
- Exceptional costs of £275k – without which the increase in budget would be well below inflation at 5.3%. These costs relate to an increase in provision for dilapidations as LeO's Birmingham lease expires; IT licences; and development to support new website infrastructure, which will help streamline operations and direct information from LeO's website into its case-management system.

A significant majority of LeO's budget comes from its levy income, with case fee income only covering approximately 6.6% of expenditure. Case fees are not charged where no investigation has been carried out by LeO, including cases resolved through early resolution, and only in certain circumstances where cases are investigated. LeO expects that a fee will apply in around half of investigation case closures in 2024/25.

As LeO continues to manage impact of the first phase of changes to its Scheme Rules, the OLC and LeO will continue to engage with stakeholders the likely timings and scope of a second phase. One of the key areas for consideration, which our consultation indicated there is appetite to discuss, is how different case fee arrangements could incentivise the early and pragmatic resolution of complaints.

2024/25 budget

Strategic objectives	Area of expense	2024/25 budget
LeO's service	Operational delivery	£11,188,340
LeO's impact	Policy, impact and engagement	£602,004
LeO's service and impact – critical enablers	Corporate functions and business support	£2,639,812
	Total staff salary expenditure	£14,430,156
LeO's service and impact – critical enablers	IT and telecoms	£1,608,598
	Premises and facilities	£737,003
	Other staff expenditure	£278,884
	Depreciation	£631,380
	Travel	£30,864
	Interest receivable	-£309,157
	Other costs	£541,874
	Total non-salary expenditure	£3,519,446
	Total revenue expenditure	17,949,602

Income source	2024/25 budget
Levy	£16,954,000
Case fees	£816,000
Sundry (from Family Services' occupancy of Edward House office)	£180,000
Total income	£17,950,000

Balancing costs against the pace of improvements

The OLC recognises that the priority must always be to give high-quality outcomes to complaints, rather than simply to resolve them quickly. While every effort is being made to absorb increases in demand, and LeO is making a continued reduction in waiting times and the investigation queue, LeO's resource is stretched.

Any further sustained increase in demand would require additional resource and for LeO to consider further in-year budget requests. For context, a further increase of 5% in demand would require a full additional team, including supporting Ombudsman and Team Leader, which would involve costs of approximately £600k. Even so, this resource wouldn't be fully effective immediately due to the time that it would take to recruit, train and get to new staff to desired levels of productivity – 12 months for investigators. This means the positive impact wouldn't be felt until 2025/26.

Following the consultation process, LeO still believes the most appropriate approach, which offers the best balance between cost and customer journey, is to absorb demand and extend the period over which anticipated improvements will be achieved. This will remain subject to close monitoring of demand.

Supporting LeO's people and delivering for customers

LeO now has considerable experience of large-scale national recruitment, meaning the focus of its efforts are now on retention as the significant and ongoing risk, rather than attraction. Attrition is one of the four assumptions – alongside productivity, core demand and the size of the investigation queue at the beginning of the year – that has the biggest impact on LeO's ability to deliver its Business Plan ambitions for resolving complaints and improving customers' experience.

Early analysis of the 2023 Civil Service People Survey indicates that pay and benefits is the only area where satisfaction has fallen each year across a 3-year period. The results of external pay benchmarking and LeO's own wider benefits review show different facets of LeO's overall offer fall short of many comparable organisations'. While LeO is doing everything it can via its People Strategy to make LeO a great place to work, many core aspects, including pay and conditions, are subject to external constraints that aren't within LeO's control.

The OLC and LeO recognise the potential negative impact of an inadequate pay award on LeO's ability to attract and retain the skilled people it needs, as well as the impact on staff of cost-of-living pressures. For 2024/25, LeO is taking forward a proposed 5% pay increase – recognising the significant ongoing risk of not presenting a competitive offer to prospective and existing staff. The OLC and LeO will continue to assess the position in light of updated government pay guidance, which is not yet available.

Improving complaints handling and legal services

The OLC's consultation process has confirmed there is considerable support for LeO to deliver an expanded and more strategic programme of engagement, learning and insight – helping to inform and influence the regulatory landscape, working closely with the LSB.

In view of this, in the first strategy year, the OLC is making a small but important increase in the relevant area of LeO's budget (from 2.5% of salary expenditure to 4%). The practical impact of the proposed increase is the addition of four roles in LeO's external affairs team. This will enable the delivery of a targeted programme of learning and insight in 2024/25, while also enabling LeO to carry out the necessary planning, development and capacity building to deliver an expanded strategic programme in future years.

There is a strong business case for service providers in engaging with LeO's insights. LeO's conversations with stakeholders suggest this "invest to save" approach is understood by the sector, although a sustainable longer-term funding solution remains subject to discussion and agreement. Once the development of LeO's future programme is underway, the resource implications for future years can be estimated more accurately.

Measuring success and value for money

The OLC and LeO openly report on a range of metrics on LeO's performance, as a cornerstone of maintaining confidence in LeO. A comprehensive agreed dataset continues to be shared with key stakeholders, and quarterly updates are [published on LeO's website](#) and shared with stakeholders directly as part of LeO's programme of engagement.

In recent years, LeO has focused on ensuring it is giving the right outcome to complaints at the earliest possible opportunity. The 2024-27 Strategy and 2024/25 Business Plan show an ongoing commitment to deliver both further proportionality and further efficiency. LeO will continue to align its value-for-money assessments with the National Audit Office's model.