

Minutes of the 148th Meeting of the Office for Legal Complaints (OLC)

Wednesday 29 July 2026

Board members present. Ric Blakeway, OLC Chair Georgina Philippou Rachel Cerfontyne Hari Punchihewa Owen Purcell Alison Sansome	In attendance Phil Cain, Chief Ombudsman David Peckham, Interim Chief Operating Officer Steve Pearson, Deputy Chief Ombudsman Blessing Simango, Head of Finance, Procurement, and ICT Zoe Grainger Head of People Strategy and Culture Mike Harris, Head of Communications, Engagement, and Impact Laura Stroppolo, Head of Programme Management and Assurance Jonathan Smithson, Government Internal Audit Agency, item 3 Mark Persard, Equality, Diversity and Inclusion Manager, item 10
Apologies: Elaine Banton. OLC Board member	
Minutes: Kay Kershaw, Board Governance Manager	

Item 1 - Welcome, Apologies, Declarations of Interest and Other Preliminary Matters

1. The Chair welcomed attendees. The meeting was quorate with a lay majority. Apologies were noted.
2. Papers presented for information were noted.
3. There were no declarations of conflict of interest.

Item 2 – Developing the 2027/30 OLC Strategy

4. The Board discussed the next iteration of the 2027/30 OLC Strategy, focussing on the strategic objectives, outcomes to be achieved by 2030, and the pathway of activities required to support delivery of the outcomes.
5. Members agreed to consolidate two proposed strategic objectives into a single objective, subject to further refinement of the wording. Members also agreed a framework of three strategic objectives and recommended reordering them to better reflect organisational priorities and intended impact.
6. The Board considered whether one of the proposed strategic objectives was more appropriately characterised as an enabling factor supporting delivery of the Strategy. Following discussion,

members agreed that it should remain as a strategic objective, recognising its importance in supporting delivery of the wider Strategy, and recommending that this relationship be reflected in the accompanying narrative.

7. The Board delegated authority to the OLC Chair to work with the Executive to refine the wording and presentation of the agreed strategic objectives, taking account of the feedback provided during the discussion.
8. The Board reflected on the long-term aims of the 2027-30 Strategy and discussed whether the proposed pathway of activities provided an appropriate framework for achieving the intended outcomes. Members emphasised the importance of clearly defined outcomes, measurable success indicators and supporting performance measures to enable effective oversight of delivery, benefits realisation and strategic impact, and provided feedback to inform the next iteration of the Strategy.

ACTION: The Executive to further refine the 2027/30 OLC Strategy and present the next iteration to the Board in September 2026.

9. The Board discussed the extent to which the current legislative framework may constrain the organisation's strategic ambition and agreed that the Executive should develop proposals for potential legislative and policy reform to support future opportunities to strengthen the organisation's role.

ACTION: The Executive to develop, by the end of the financial year 2026/27, proposals for potential legislative and policy reform to support future opportunities to strengthen the organisation's role.

10. Members discussed the importance of identifying barriers to implementation and maintaining effective stakeholder engagement to support delivery of the Strategy. In relation to the Model Complaints Resolution Procedure (MCRP), the Board requested further analysis of sector adoption, barriers to implementation, comparative complaint handling arrangements across the sector, and the quality and accessibility of complaint handling data.

ACTION: The Executive to present a paper to the Board by the end of financial year 2026/27 on sector adoption of the MCRP, barriers to implementation, comparative complaint handling arrangements, and the quality, robustness and accessibility of complaint handling data.

Item 3 – Strategic Risk Update

11. The Board discussed the proposed 2026/27 Strategic Risks and Issues and Risk Appetite Statement.
12. The Board discussed the proposed assessment of the risk appetite and tolerance position for the strategic issue relating to the organisation's ability to sustainably manage demand within its current operating capacity.
13. Members acknowledged that the issue was likely to remain outside tolerance for a prolonged period despite existing mitigations, due to ongoing demand pressures, external funding decisions and the timescales associated with transformational activity. The Board emphasised the need for risk and assurance reporting to clearly explain the reasons for this position, the planned mitigations and the anticipated route back to tolerance.
14. Members recommended that the organisation's risk appetite and tolerance model be reviewed as part of a future review of the risk framework to support a consistent and transparent approach to assessing strategic risks and issues.
15. The Board discussed emerging risks, including the potential implications of significant law firm closures, and highlighted the importance of insight, intelligence sharing and regulatory collaboration in identifying and responding to such risks.
16. Members noted that further work to identify critical roles, assess organisational dependencies and review succession planning arrangements would inform the future assessment of the key person dependency risk.
17. The Board discussed the strategic risk relating to delivery of transformation outcomes, noting that programme-level risks, including enterprise strain and digital and AI-related risks, would continue to inform assessment of the overarching risk.
18. The Board **approved** the Risk Appetite Statement and Strategic Risk Register, subject to the refinements discussed.

Item 4 – Governance Refresh

19. The Board considered proposals to refresh governance arrangements, including the establishment of a Board Transformation Sub-Group (BTSG), to strengthen assurance and oversight of the Scheme Transformation Programme.
20. Members discussed the role of the BTSG within the wider governance framework, emphasising the need for clear accountability, delegation and decision making responsibilities, effective reporting and assurance arrangements and appropriate Board oversight.
21. The Board noted that the BTSG would provide focused scrutiny and assurance of transformation activity, with matters escalated through the appropriate governance routes for consideration and approval. Members also noted that assurance arrangements should be kept under review as the programme progressed to ensure they remained proportionate and effective.
22. The Board discussed the governance arrangements for digital and AI-enabled solutions and agreed that a digital and AI ethical framework should be presented for consideration at a future Board meeting.

ACTION: The Executive to present the organisations digital and AI ethical framework to the Board by the end of Q3, or Q4 if required.

23. The Board noted that the Performance Sub-Group (PSG) would be retained on a transitional basis to support oversight of organisational performance and planning activity, with its future role to be reviewed on completion of the 2027/28 planning cycle.
24. The Board approved the refreshed governance arrangements, including the establishment of the BTSG and its Terms of Reference, subject to clarification that the BTSG operates within the delegation authority approved by the Board.

ACTION: The Head of Programme Management and Assurance to update the Board Transformation Sub-Group's Terms of Reference to reflect that the Group operates within the delegated authority approved by the Board.

25. The Board agreed that the effectiveness of the BTSG, including its assurance role, reporting arrangements and meeting cycle, should be reviewed following implementation of the refreshed governance framework.

Item 5 – Previous Minutes, Actions and Matters Arising

26. The Board approved the minutes of its meeting held on 17 June 2026 for accuracy and publication. The Board also approved the minutes of the ARAC meeting held on 11 May 2026 and the PIDCo meetings held on 11 November 2025 and 27 February 2026 for publication.

ACTION: The Board Governance Manager to arrange for the publication of the minutes of the Board meeting held on 17 June 2026, the ARAC meeting held on 11 May 2026, and the PIDCo meetings held on 11 November 2025 and 27 February 2026.

27. The Board noted an update on previous actions.

Item 6 – Feedback from the OLC Committees

28. The Board noted updates from the Chairs of RemCo, PIDCo and PSG on matters considered since the previous Board meeting.

Item 7 –Chief Ombudsman's Report

29. The Board considered the Chief Ombudsman's Report, noting its value as a consolidated overview of organisational performance, strategic developments and key risks, complementing other Board reporting.
30. Members discussed proposals within the Civil Justice Council's consultation on Part III of the Solicitors Act 1974, noting the legislative change that would be required and the significant implications for LeO should responsibility for lower-value costs disputes transfer to the organisation.
31. The Board noted the ongoing level of sickness absence and the actions being taken to support improvement and agreed that the position be reviewed further once updated data was available.

Item 8 – Integrated Performance Report

32. The Board noted the Integrated Performance Report, and strategic scorecard for Q1 2026/27.

33. The Board discussed proposed changes to the operational performance reporting, noting that the proposals would provide greater transparency and visibility of the totality of casework across all stages of LeO's process and support a more comprehensive understanding of organisational demand and performance. Members noted that the proposals had been developed in consultation with the PSG and that the scorecard remained under development.
34. In considering the proposed changes, the Board reflected on the importance of clearly distinguishing between case queues, backlog and work in progress within performance reporting.
35. The Board emphasised that publication of revised operational performance reporting, including the totality of casework within the system, would require a clear communications and stakeholder engagement approach to minimise the risk of misinterpretation and provide context for changes to the reporting methodology. The Board requested that the Executive Team develop a communications and stakeholder engagement approach and share this with the Board for further consideration.

ACTION: Executive Team to develop a communications and stakeholder engagement approach to support publication of the revised performance reporting framework and share with the Board for further consideration.

36. The Board discussed the ongoing development of operational performance reporting, noting that proposals for interim service level agreements would be subject to further scrutiny by the PSG, alongside enhancements to reporting on cases within and outside agreed service level expectations. Members suggested that benchmarking against comparable ombudsman schemes may assist in informing service level expectations and requested that the outcome of the PSG's consideration of the proposed service level arrangements and reporting framework be brought back to the Board.
37. Members noted that future service standards would be informed by the target operating model developed through the Scheme Transformation Programme.
38. The Board noted early indications that the new operating model was supporting improved case progression, greater transparency of workflow and reduced waiting times compared with previous arrangements. Members emphasised the importance of continued monitoring through the developing performance framework to assess its impact and effectiveness.
39. The Board discussed the management of legacy cases and received an update on plans to reduce the remaining legacy caseload. Members emphasised the importance of monitoring

progress against planned trajectories and receiving regular assurance regarding delivery and resource requirements.

40. The Board requested further consideration of reporting on the age profile of the legacy caseload to support oversight of customer waiting times, monitoring of the legacy case reduction plan and assurance regarding progress in reducing older cases.

Item 9 – Regulatory Objectives

41. The Board discussed the Regulatory Objectives report, welcoming its development as an emerging source of insight and assurance regarding LeO's contribution to the regulatory objectives. Members noted that the report remained in development and discussed its future role in supporting Board assurance, engagement with key stakeholders and regulators, and wider sector learning.
42. Members recognised the practical limitations associated with the current production of the report and discussed how its content and format could evolve over time to maximise strategic value while remaining proportionate. Members also reflected on the importance of understanding how information shared with regulators was used and the impact it achieved
43. The Chair invited further feedback out of committee from Board members outside of the meeting to inform the report's ongoing development and offered to meet with interested members to discuss this further.
44. The Board discussed the framework for identifying, managing and escalating potential misconduct referrals and agreed that further work was required to support consistent decision making and assurance. Members requested that a revised framework was presented to the Board for further consideration
45. **ACTION: The Executive Team to present a revised misconduct referrals framework to the Board in October 2026.**

Item 10 - Public Sector Equality Duty Bi-annual Compliance Update

46. The Board discussed the Public Sector Equality Duty (PSED) Compliance Report, and welcomed the progress made against the EDI Strategy and PSED objectives.

47. Members discussed opportunities to strengthen EDI considerations within procurement and supplier oversight arrangements and agreed that this area should be explored further.

ACTION: The EDI Manager to explore opportunities to strengthen EDI considerations within procurement and supplier oversight arrangements and provide an update to the Board in January 2027.

48. Members welcomed proposals to introduce role-specific EDI objectives through the Performance and Development Review framework as part of the wider pay and grading review and performance management arrangements.

49. The Board discussed LeO's approach to reasonable adjustments and emphasised the importance of ensuring adjustments were implemented consistently and remained effective in supporting colleagues.

50. Members discussed the potential value of benchmarking the organisation's EDI performance and outcomes against comparable organisations and wider public sector best practice to provide assurance on progress and inform future development.

51. In discussing future priorities, Members highlighted the importance of embedding EDI considerations across organisational culture, policy development and service delivery, including through staff networks, leadership and Board visibility and ensuring inclusive decision making.

Item 11 – Transparency Publications Reports

52. The Board approved the publication of the Q1 Transparency Reports, subject to the Board Member Register of Interests being updated to reflect declarations notified before and during the meeting.

ACTION: The Board Governance Manager to update the Board Member Register of Interests to reflect declarations notified before and during the meeting.

53. The Board noted that there were no entries in the Gifts and Hospitality Register during Q1.

ACTION: The Board Governance Manager to arrange for the Q1 transparency reports to be published.

Item 12 – Board effectiveness

54. The Board reflected on the effectiveness of the meeting and noted the importance of ensuring sufficient time was available for discussion of strategic matters, assurance and key decisions. Members recognised the challenges presented by increasingly full agendas and agreed that consideration should be given to the overall volume of agenda items, the appropriate use of reports and presentations, and how matters could be structured and prioritised to maximise effective Board discussion and scrutiny.

Item 13 - Voluntary assurance letter

55. Members noted that further consideration would be given to how future iterations of the Voluntary Assurance letter might be informed by the ongoing development of the Regulatory Objectives reporting framework.

Item 14 – Publication and external distribution of July’s Board papers

56. It was agreed that an out of committee decision would be sought on the approach to the publication and distribution of July’s Board papers.

Item 15 – Any other business

57. The Board noted the requirement to convene an extraordinary Board meeting in November 2026 to consider matters requiring approval ahead of the submission of key documents to the LSB for consideration at its November Board meeting. Members were reminded to confirm their availability to facilitate scheduling of the meeting.

58. There was no other business discussed.