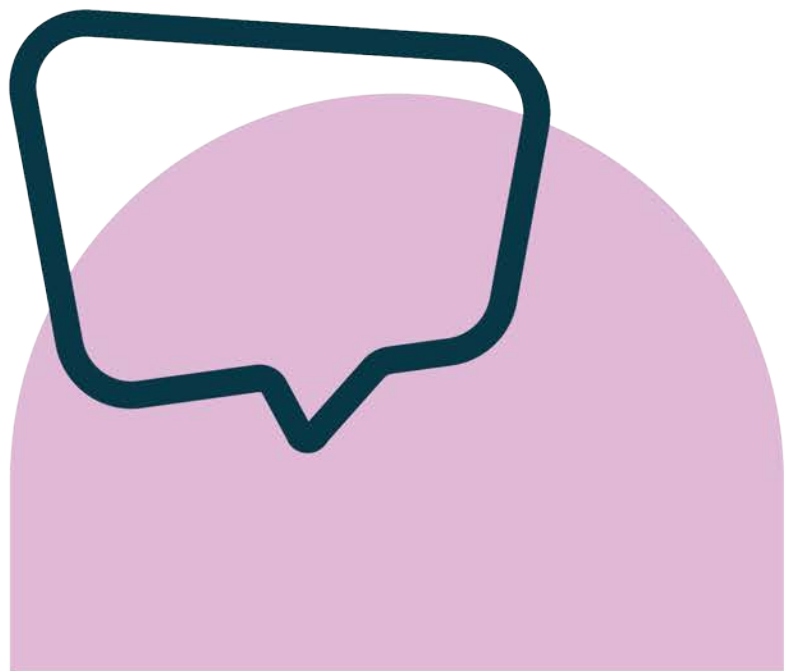


Model Complaints Resolution Procedure (MCRP)

Call for Input

March 2026



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About the Legal Ombudsman

The Legal Ombudsman scheme (LeO) was established by the Office for Legal Complaints (OLC) under the terms of the Legal Services Act 2007 (the Act). 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.

1. Executive Summary

Effective complaints handling has never been more important. Consumers now expect quick, clear responses when concerns arise, and the speed at which reputational impact can spread online means that resolving issues early is no longer optional - it is essential. At the same time, service providers across the legal sector are facing rising complaint volumes, increasingly complex expectations, and there is significant variation in how complaints are handled. In too many cases, outdated or inconsistent procedures mean that small matters escalate unnecessarily, increasing pressure on staff and leaving consumers feeling unheard.

Against this backdrop, LeO has developed a **Model Complaints Resolution Procedure (MCRP)**: a simple, consistent and evidence-based procedure with supporting guidance and templates which have been designed to help providers resolve complaints more quickly, more effectively and with greater confidence. Built from LeO's unique insight into what drives escalation, what good practice looks like, and what consumers say works for them, the MCRP focuses on early, constructive engagement and a clear, proportionate route to resolution. It also incorporates the flexibility needed to work across different business models, practice areas and consumer needs.

The benefits of adopting the MCRP are clear. A streamlined structure which places emphasis on the early resolution of complaints not only reduces the time taken to resolve complaints, but also brings much needed consistency to first-tier complaint handling. By

adopting the model procedure, providers gain reassurance that their approach aligns with sector expectations and regulatory requirements, while consumers benefit from clearer communication, quicker outcomes and a process that is easy to understand. Evidence from our Pilot undertaken with cross-sector representation shows that for many service providers the MCRP could lead to faster resolutions, fewer escalations and more positive experiences for both consumers and providers.

This call for input invites the sector to help shape the final version of the MCRP and the supporting guidance. We want to ensure the model works for every type of provider and reflects the real-world experiences of those who will use it. Feedback from legal service providers, representative bodies, regulators and consumer organisations is vital to refining the tools that sit alongside the procedure. Your insight will help us deliver a model that supports high-quality complaint handling across the sector when we publish the final MCRP later this year.

The call for input is open from 24 March until **midday on 19 May 2026**.

You can share your feedback to our questions (see pg. 15-17) via our online survey:
<https://forms.office.com/e/mxDp2nk9NF>

You can also respond by sending your views to:
consultations@legalombudsman.org.uk

If you have any questions about the call for input, please email us at:
consultations@legalombudsman.org.uk.

2. MCRP: Introduction and development

Complaints handling sits at the heart of a fair and trusted legal services market. As expectations rise and consumers increasingly choose providers based on transparency, responsiveness and trust, organisations are having to navigate a more demanding environment. Complaints are becoming more frequent, more complex and more visible, and the way they are handled can have a lasting impact on both reputation and client confidence.

For legal services providers, dealing with complaints can place significant strain on time and resources, yet there remains considerable variation in how service providers approach the task. Some procedures have developed in disparate ways over time, resulting in processes that are inconsistent, overly complicated or out of step with modern expectations. This makes it harder for teams to manage complaints efficiently and can leave consumers uncertain about what to expect.

At the same time, consumers have an increasingly clear sense of what “good service” looks like, and are clearer than ever about the standards they expect. Where something has gone wrong, they want a prompt, straightforward explanation and resolution. When those expectations are not met, issues can escalate quickly. Minor concerns can become more serious, communication can break down and the situation can become harder to resolve, increasing pressure on both parties and potentially damaging relationships.

This convergence of pressures presents a valuable moment for the sector to rethink how first-tier complaints are handled. A more consistent, streamlined and resolution focused approach can prevent escalation, reduce the operational burden on providers and give consumers confidence that their concerns will be addressed swiftly and fairly.

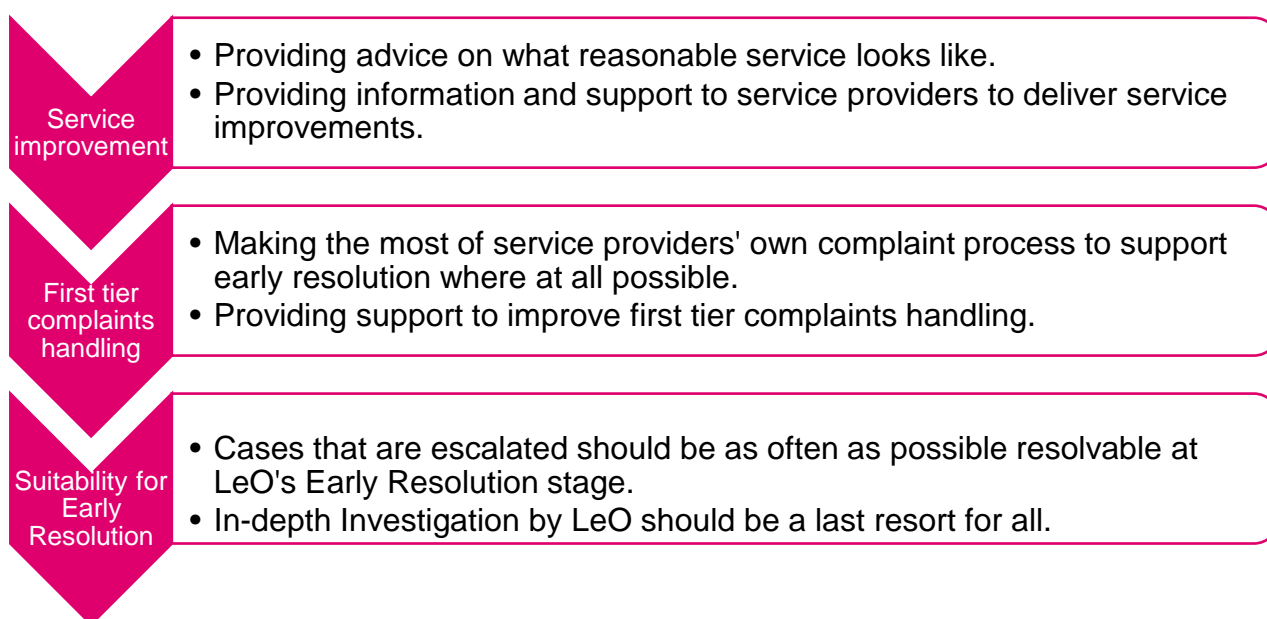
LeO’s view is that improving complaint handling is best achieved collaboratively. By bringing together learning from across the sector, supporting the sharing of good practice and providing a model that offers clarity and flexibility, we can help create greater consistency and better outcomes for everyone involved. The Model Complaints Resolution Procedure (MCRP) has therefore been developed to provide exactly that: a clear, practical procedure that supports early, constructive engagement and gives providers confidence that their approach aligns with what good practice looks like.

LeO’s unique position

Since its inception in 2010, LeO has continued to see significant variation in practice, process and culture when it comes to in-house (“first-tier”) complaint handling. Some service providers are consistently providing consumers with an excellent service, whilst others are providing an inadequate first-tier complaints handling experience, and some are not responding to complaints at all.

A central pillar of the **Office for Legal Complaints’ (OLC) 2024-27 Strategy** for LeO is a commitment to share more learning and insights. Over more than 15 years of resolving complaints from consumers of all types of regulated legal service providers, LeO has built a substantial body of knowledge about how complaints arise, how they are handled, and what drives escalation. This experience has generated rich data and a clear picture of recurring themes, including common weaknesses in first tier complaint handling, the factors that prompt consumers to take their concerns further, and the service issues that create the most dissatisfaction.

Our experience has shown that there are three key stages at which we can share those insights, with a view to supporting and improving the whole legal sector:



In addition to the OLC’s strategy, the Legal Services Board has **placed requirements on regulators** to deliver the best possible complaints resolution system. Key features are consumer confidence, accessibility, the provision of information, communication with complainants and continuous learning.

What is LeO seeing in complaints handling?

There have been a number of concerning trends in terms of the complaint handling in the complaints that escalate to LeO for resolution:

- A substantial and increasing proportion of complaints involve failures in complaint handling (49% of all complaints resolved with investigative outcomes had findings of poor complaints handling in 2024/25).
- In 2024/25, 28% of complainants who escalated their complaint to LeO said they did not receive a final response from their service provider.
- Within first tier complaints handling, there is a huge variation in practice, process and culture – LeO sees in particular issues around quality of investigation, responses and communication.
- Examples of failures have remained consistent for over a decade – the number and proportion have increased over time.
- An increase in premature complaints – from 25 to 28% – indicating consumers not following the correct procedure before bringing their complaint to LeO.
- Legal Services Consumer Panel **research** says 21% of service users don't know how to complain, and 28% are uncertain.
- Sustained increases in demand for LeO that could have been prevented –creating an upward pressure on our resourcing.

These figures highlight a growing challenge – not just for LeO, but for the entire sector.

However, there is no single reason for the increase in complaints being made, as there are many contributory factors, including more consumers using legal services, increased consumer expectations, and the rising use of AI, as well as economic pressures on consumers and service providers. But evidence of poor first-tier complaint handling continues to increase.

Development of the MCRP

In developing the MCRP, it has been important to reflect on a number of different viewpoints:

- **What LeO sees every day** – the themes, the common pitfalls and good practice markers that influence whether a complaint is escalated or can be resolved early on.
- **What providers tell us they need** – clarity, simplicity, and the reassurance that their processes comply with regulatory requirements and align with good practice.
- **What consumers say works for them** – early, constructive conversations with clear explanations and accessible language.

LeO's research of complaint handling advice around the world has been extensive, considering information produced by:



As part of our research, LeO met with Financial Ombudsman Service, Parliamentary and Health Service Ombudsman, LGSCO, the Cost Lawyers Standards Board, the Office of the Ombudsman (Ireland), the Victoria Legal Services Board and Commissioner (Australia) and the New Zealand Banking Ombudsman, discussing their experiences and capturing lessons learned.

Consistent features from these interactions and wider research were:

- A small number of defined stages;
- A process that's easy to apply and to understand;
- A clear definition of a complaint;
- A respectful culture (both ways);
- A focus on resolution of the dispute (which could include an explanation);
- Confirmation of any outcome in writing; and
- Support materials from the body providing the procedure.

The conclusion was that the prototype for our MCRP should include these features.

LeO's MCRP also takes on board what we've learned from our experience of handling complaints in the legal sector, including:

- A process which can be tailored for different types and sizes of service provider;

- A process which can be varied depending on the nature of complaint (recognising that not all complaints are suitable for early resolution); and
- A process which is supported by documents developed with a good understanding of issues the sector faces.

Alongside the MCRP, it was also very clear that LeO would need to develop a range of supporting guidance, toolkits and templates to support the improvement of complaint handling across the sector.

Building on this evidence and the themes emerging across the sector, LeO has focused on developing a practical procedure and toolkit that directly addresses the issues we see most often in escalated complaints and aligning with the wider drive across the legal sector to improve the quality, consistency and accessibility of complaint handling at first tier. The MCRP has been designed with the sector, for the sector. It has been tested with providers of different sizes, regulated by different bodies, and operating in different areas of law. It has been shaped by their feedback and is designed to work alongside different regulatory requirements.

Fundamentally, the procedure is rooted in the principles of:

- Improving the overall service provided by legal service providers;
- Increasing consumer understanding about what to expect from their service provider;
- Increasing consumer confidence in legal sector complaints processes and resolutions;
- Improving the recognition of what constitutes a complaint;
- Improving the process and handling of those complaints;
- Speed up the resolution of complaints for both parties;
- Embed learning and improvement across the sector;
- Reduce the number of complaints being made to service providers; and
- Reduce the number of complaints that need to be escalated to LeO.

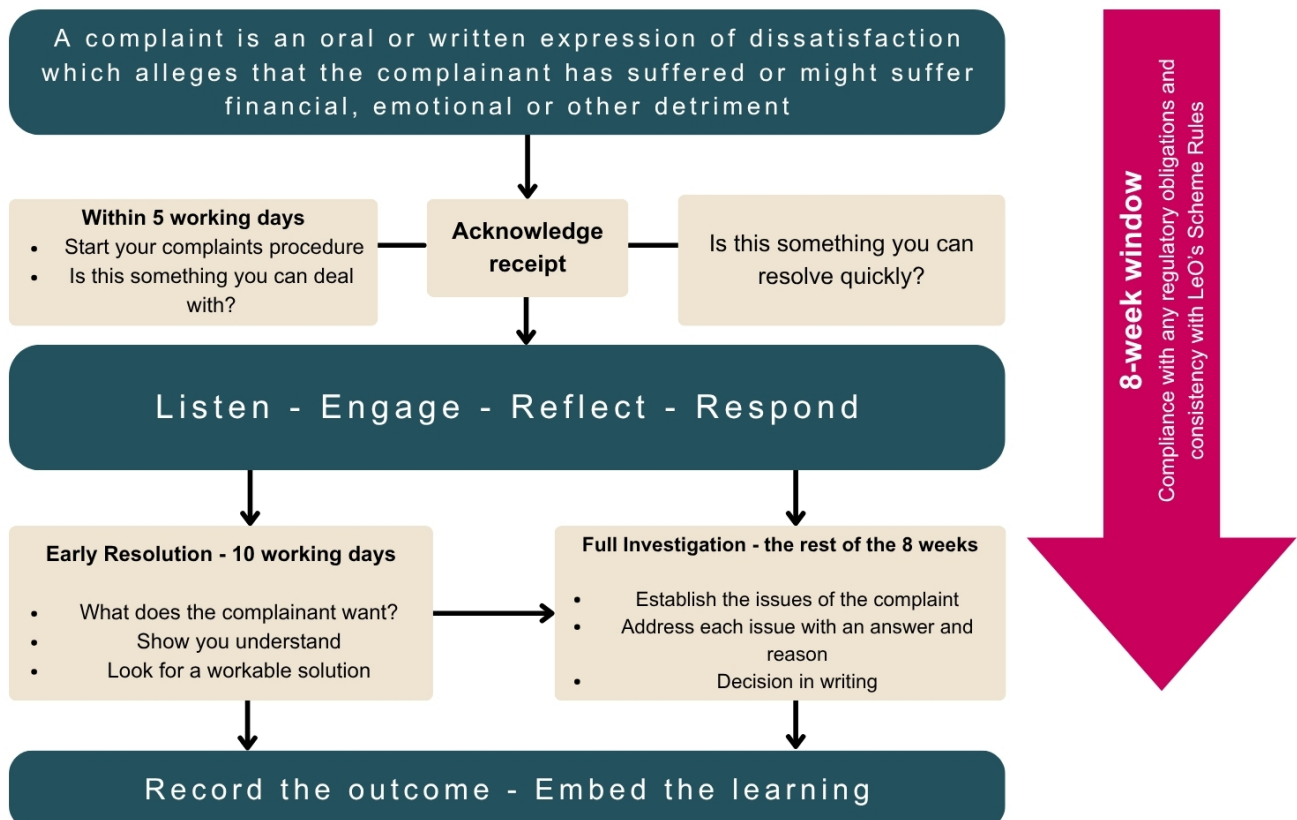
3. Structure of the MCRP

The MCRP is not just a set of principles or a theoretical framework. It is a practical, tested and evidence-based procedure that reflects real experiences across the sector. Importantly, the MCRP is not just aimed at improving complaints handling across the sector, but also to support a shift in the culture of complaints handling. The focus on *resolution* is deliberate.

The overall structure

The categorisation of what defines a complaint is a point of considerable inconsistency in the legal sector. Even if what is received is understood to be a complaint, not all service providers acknowledge receipt as standard, and the MCRP requires this as a first step, because it helps both parties recognise that what has been received is being taken seriously.

The MCRP structure is as follows:



Importantly, regulatory requirements **must** continue to be met, including the window within which the whole process should complete. For the vast majority of service providers, this is

eight weeks.

The acknowledgement

The MCRP includes a compulsory complaint acknowledgement. The procedure allows up to five working days for that acknowledgement to be sent to the consumer.

Key features of this stage include:

- A clear acknowledgement a complaint has been received, with information about the next steps.
- Briefly summarising the complaint.
- If needed, requesting additional information to support the handling of the complaint.

Early Resolution

The first stage in the MCRP is the Early Resolution stage.

Not all complaints are suitable for Early Resolution. It is for the service provider to decide whether this stage is suitable for the complaint and the consumer.

Factors which service providers may want to consider include:

- Is the complaint something that can be resolved with an explanation?
- Is there a clear service failing that can be resolved?
- The length of the retainer (longer retainers can still be suitable for Early Resolution).
- What the consumer wants.
- The consumer's needs.
- The consumer's availability.
- Whether additional information is needed to consider the complaint.
- The complexity of the complaint.

For best results, we encourage Early Resolution attempts by telephone or in person (where suitable for the consumer), but email can also work.

Importantly, Early Resolutions should still be confirmed in writing. This can be shorter than a full and detailed final response. A template response has been developed by LeO for this.

The Early Resolution should confirm the issues of complaint considered, the resolution and confirmation of the consumer's agreement to that resolution.

Full investigation

Complaints which are not suitable for Early Resolution, or where an Early Resolution has been unsuccessfully tried, should pass to Full Investigation.

This is the final stage of the MCRP, so the consumer should receive one, final response to their complaint.

Key features of the final response are:

- Clearly setting out the complaints made and those considered (including an explanation of any complaints not addressed, such as if they are about a third party).
- Clearly setting out a conclusion for each issue of complaint, indicating whether it is upheld.
- Providing an overall conclusion and how the service provider intends to put any service failing right, where relevant.
- A clear reference to LeO's **Guidance on Remedies** to support any offered remedy.
- Signposting to LeO.

Supporting materials

The research conducted made clear that successful implementation would require guidance for those using the MCRP on how to use it to best effect. Alongside this, practical information would help the avoidance of common mistakes and example letters would help give service providers confidence in their use of the MCRP.

In preparation for a pilot of the MCRP, LeO prepared a pack of information for service providers:

Guidance

- When to use the MCRP
- How to use the MCRP – timescales and process
- How to use the MCRP – Early Resolution
- How to use the MCRP – Full Investigation

Letter templates

- Complaint confirmation
- Early Resolution agreed
- Evidence needed from the complainant
- Managing unacceptable behaviour
- Final response to the complaint
- No further response

Toolkit

- How to review and present evidence to support good complaint handling
- Complaints about conduct, negligence, advice and costs

Following the Pilot feedback, we have also developed further guidance, which includes:

1. The definition of a complaint
2. Dealing with complaints on ongoing retainers
3. Handling complaints - small and large service providers
4. What to do when a complainant doesn't engage
5. Making use of evidence in the Early Resolution process

Guidance for consumers

The MCRP is a process for service providers to use when dealing with and seeking to resolve complaints. Therefore, the majority of the documentation is service provider focussed. However, it is also important that consumers know how to complain and are supported to make constructive complaints and understand the MCRP. We have therefore also developed the following consumer-facing documents and tools:

- A template letter for how to complain to your service provider.
- Guidance on how to complain to your service provider, including what information to provide, and how to engage constructively.
- Consumer guidance on the application and use of the MCRP, as well as guidance where a service provider is not using the MCRP.

These documents have been developed alongside consultants and will be consumer tested before they are launched alongside the final version of the MCRP and the service provider guidance.

The benefits of adopting the MCRP

Benefits of the MCRP



The MCRP offers a clear, adaptable structure, designed to help organisations resolve complaints quickly and effectively, and offering flexibility to fit diverse business models and needs across the sector.

During the three-month Pilot (see Annex A), ten diverse service providers used the MCRP with real complaints, across multiple areas of law and different regulatory environments.

Across 631 complaints made to those firms during the pilot period, the model consistently delivered faster, clearer and more effective outcomes:

- **Over two thirds of all complaints were assessed as suitable for Early Resolution and 57% were fully resolved at that stage** - often through a simple explanation, prompt action or a constructive conversation.
- **The average time to resolve a complaint at Early Resolution was just seven days**, compared with 21 days for those requiring Full Investigation.
- **Only 19 of the complaints raised at first tier have been escalated to LeO** during the pilot period, and of those reviewed, **92% were considered suitable for LeO's own Early Resolution process, with 77% already resolved** - a strong indication that the model supports earlier de-escalation and more proportionate outcomes.

Service providers told us the MCRP gave them clearer structure, reduced administrative burden and improved client communication, while consumers benefited from quicker, more transparent resolutions.

One Pilot participant said:

“Our view would be that the MCRP pilot has been beneficial and resolved a good amount of complaints sooner than we may have originally. The supporting documents provided gave good insight into the preferred approach of the Legal Ombudsman that we can implement to provide better complaints handling at tier one but also aids the review of tier two matters.”

Critically the MCRP is also supported by a suite of supporting guidance, tools and templates which will save service providers time, and enable them to align their approaches to LeO's.

4. Call for Input

Our next step is to make sure every organisation not only understands what we have created, but can see the real value it offers in practice. We want providers to have the chance to shape the final package, ensuring the supporting materials are as useful, intuitive and impactful as possible. Your insight will help us refine the materials, so the MCRP works effectively for every type of provider before we publish later this year.

Included with this call for input are details of the MCRP and the supporting guidance. Not included are the template letters and toolkits, which are continuing to be developed during the call for input, and will also reflect the feedback received on what more support is required. The final template letters and toolkit will be published as part of the full launch of the MCRP.

LeO has sought to balance the desire to ensure there is sufficient time for the sector to provide input on this work, with the need to deliver improvements in complaints handling. As a result, we have decided to run the call for input for an eight-week period, but will also offer lots of different ways to engage with us on this work, to make the best use of everyone's time.

Call for Input: Questions

Overall views

1. Having reviewed the MCRP and supporting information, what are your overall views on the model as a framework for improving complaint handling across the sector?

Adoption

If you are a legal services provider, you may wish to comment on whether you would adopt the MCRP and provide your reasons for that position.

If you are responding from another perspective – such as a consumer, representative organisation, regulator, or other professional group – please tell us how you think the model could support effective complaint resolution across the sector.

2. If you are a legal service provider, to what extent would you consider adopting the MCRP?
 - a) Would you adopt it in full or in part?
 - b) If in part, which elements would you be most likely to adopt, and why?

3. Are there any factors that would make it difficult for you, or the organisation you represent, to adopt the MCRP or elements of it?

Please describe the practical, operational or cultural barriers you foresee, and what could be done to overcome them.

MCRP – Early Resolution

4. A key feature of the MCRP is early resolution. What do you see as the benefits or potential challenges of placing greater emphasis on resolving complaints at an earlier stage?
5. What additional guidance, information, or support could LeO provide to help promote and enable the early resolution of complaints?

MCRP – Full Investigation

6. Where early resolution is not possible or appropriate, the MCRP proposes simplifying the full investigation process into one final written response at the end of the Full Investigation stage. What do you consider are the benefits and challenges of this approach?

Supporting materials

7. What additional guidance, templates and tools would help you, or the organisations you represent, implement the MCRP more effectively? Are there specific resources that would make adoption easier and more attractive?
8. Based on the Pilot feedback (Annex A) and your own experience, are there any aspects of the MCRP that you feel may not work for certain types of organisations, consumers or those you represent? If so, what challenges do you foresee and how might they be overcome?

Consumer facing guidance

We set out our approach to developing new guidance for consumers in section three. We'd particularly welcome feedback from consumer organisations in respect of the following:

9. What, in your view, are the most important factors that should be included in our guidance for consumers to ensure it is clear, accessible and effective?

10. Considering the MCRP and supporting materials through the consumer lens, is there any additional information or support that LeO should provide to service providers to ensure complaints handling meets the highest possible standard?

Any other comments or feedback

11. Do you have any other comments on, or feedback about, the MCRP that you would like to share with us?

How to contribute

The call for input is open until **midday on 19 May 2026**.

You can share your feedback to our questions via our online survey:

<https://forms.office.com/e/mxDp2nk9NF>

You can also respond by sending your views to:

consultations@legalombudsman.org.uk

We encourage online responses wherever possible.

If you need to write to us,

send your response to: **Legal Ombudsman, PO Box 6167, Slough, SL1 0EH.**

We will also be holding a series of webinars which will provide the opportunity to hear more about the MCRP, ask questions and provide valuable feedback.

The webinar sessions will be held on:

- Tuesday 28 April 2026 – small and medium service providers
- Tuesday 5 May 2026 – large/volume service providers
- Thursday 7 May 2026 – wider interest groups/open session

If you would like to register for these sessions, please email

consultations@legalombudsman.org.uk, confirming your name and which session you would like to attend.

Our approach to your feedback

LeO will carefully consider all responses to this call for input. The MCRP has been developed and tested with a wide range of service providers, and early feedback indicates that many service providers recognise elements that feel familiar or which align with existing approaches – something we hope will make adoption straightforward and achievable.

At the same time, we know that real-world experience across different organisation types and consumer groups is essential to getting this right. Your insights will play a vital role in shaping the final package. While our development work to date, and the results of our pilot exercise, give us confidence that major changes to the MCRP itself should not be necessary, your views about what additional guidance, tools or support are required to support the MCRP to work effectively for the full diversity of providers and clients they serve are really important. We are particularly keen to understand where further clarity or resources would make implementation easier or more attractive.

We will share an overview of the feedback we receive, and how we have taken it into account, ahead of the final launch.

Annex A: The MCRP Pilot and its findings

Following engagement with organisations in other sectors that have developed and implemented model complaints procedures (see section 2), LeO identified piloting as a critical factor in the success of those initiatives. Running a structured Pilot was therefore a central part of our approach, allowing us to test the MCRP in real-world conditions and to refine it in light of practical experience.

This section sets out the approach we took to the Pilot, the scope of testing undertaken, and what we learned as a result.

What we did

The purpose of the Pilot was to test the draft MCRP, alongside the supporting guidance, templates and tools, and to assess how the model operated in practice. In particular, the Pilot sought to:

- Test the procedure and supporting materials to understand what worked well and where refinements or additions might be needed;
- Gather qualitative feedback and, where appropriate, quantitative data on the usability and effectiveness of the MCRP and supporting pack; and
- Engage service providers directly in the development process, with a view to building understanding of the model and supporting future adoption.

To ensure the Pilot reflected the diversity of the legal sector, service providers were selected against the following criteria:

- The maximum number of service providers in the pilot is 12
- There must be a range of sizes (sole practitioner, small, medium, large)
- There must be at least one chambers
- The service providers must include members of Solicitors Regulation Authority, Bar Standards Board and the Council for Licenced Conveyancers.
- The service providers must cover a number of different areas of law
- The service providers must be prepared to use the full package of materials and have a complaint handling system in place which allows them to be flexible to adapt to trialling the MCRP
- The service providers must agree to share all GDPR-compliant recording data and experience with LeO, the regulators and the other participants
- There must be no ongoing regulatory actions against the service provider at the start of the Pilot

- The relevant regulator must be content for the service provider to participate in the Pilot.

What we piloted

Pilot service providers were asked to use the MCRP to handle all complaints received over a three-month period, either across their entire business or within a defined, ringfenced area of work. For the duration of the Pilot, the MCRP replaced the providers' existing first tier complaints procedures.

Our Pilot service providers

In total, we selected ten service providers participated in the Pilot, operating across four regulators and including two sets of chambers. Participants varied in size and operated across a number of different areas of law.

What we learned

Key headlines

- No significant issues were identified with either the MCRP procedure or the supporting materials;
- The model was capable of working across a wide range of providers, practice areas and regulatory frameworks;
- No significant additional guidance or documentation was identified as being necessary; and
- A number of providers chose to retain all or part of the MCRP following the Pilot.

The Pilot demonstrated that the MCRP works effectively in practice and delivers tangible benefits across a wide range of service providers and complaint types. A clear acknowledgement stage, combined with a strong emphasis on early, constructive engagement, enabled many complaints to be resolved more quickly and with less formality, often avoiding the need for a full investigation.

Providers reported that the structure of the MCRP increased confidence in their approach to complaints, reduced administrative effort and improved the clarity and consistency of communication with consumers. The Pilot also reinforced the importance of flexibility: while the core structure was valued, providers appreciated being able to apply the model proportionately to different business models, practice areas and consumer needs.

Overall, the findings confirmed that a simpler and more consistent first tier process improves outcomes for both consumers and service providers and increases the likelihood that

complaints which do escalate to LeO are better prepared for early and proportionate resolution.

Key data headlines

- A total of 631 complaints were considered by the Pilot service providers using MCRP
- Only 19 of the complaints raised at first tier have been escalated to LeO and of those reviewed, 92% were considered suitable for LeO's own Early Resolution process, with 77% already being resolved.
- 57% of complaints resolved during the Pilot were resolved at MCRP Early Resolution
- The average time to resolve a pilot complaint at MCRP Early Resolution was 7 days
- The average time to resolve at pilot case at full investigation was 21 days

Highlighted Pilot participant feedback

“Our view would be that the MCRP pilot has been beneficial and resolved a good amount of complaints sooner than we may have originally. The supporting documents provided gave good insight into the preferred approach of the Legal Ombudsman that we can implement to provide better complaints handling at tier one but also aids the review of tier two matters.”

“The procedure is clear and well structured with very clear stages.”

“Our view is that the pilot scheme helped confirm that our current approach was broadly aligned, while also highlighting areas we had not previously considered. The template responses offer a valuable framework that we can integrate into our communications to ensure comprehensive coverage. This enables complainants to fully review the outcome and make an informed decision on whether to accept the resolution or pursue further escalation if necessary.”

“Nothing in here that would cause anyone any issues”

“The documentation is useful, but the process overall should not be anything new to a firm with a robust approach to consumer care. It is possible that other firms that do more quick-turnaround work would find the option to avoid a full file review as per the quick resolution process useful.”

Types of complaint and areas of law

The Pilot considered complaints from the following areas of law:

- Personal injury
- Residential conveyancing
- Family
- Litigation
- Wills and Probate

These areas of law are the top five areas of law LeO receives complaints about.

Pilot firms recorded considering complaints about:

- Communication (including failure to respond)
- Delay and failure to progress
- Costs
- Advice (including failure to advise)
- Failure to follow instructions
- Wider service issues (for example changes of case handler)

This includes all of the main types of complaint that are raised with LeO.

What makes a complaint suitable for Early Resolution v what makes it suitable only for a Full Investigation?

Participants recorded the factors influencing whether complaints were suitable for Early Resolution or required Full Investigation. Early Resolution was more likely where consumers were available and willing to engage, issues were straightforward and resolution could be achieved through explanation or action. Full Investigation was more likely where complaints were complex, involved significant financial remedies, third parties or vulnerability, or where the consumer requested a formal investigation.

Factors which are more likely to lead to complaints being suitable for Early Resolution	Factors which are more likely to lead to complaints proceeding to Full Investigation
• Consumer availability	• Consumer request

<ul style="list-style-type: none"> • Consumer willingness to resolve • Ease of resolution • Fewer/simple complaints • Consumer providing information about what they wanted for resolution • Complaints requiring action plans as resolutions 	<ul style="list-style-type: none"> • Complex/multiple complaints • Desired remedy (significant compensation/financial loss) • Third party complaints • Complaints from vulnerable consumers
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One area where there were varying views on the suitability for Early Resolution was the length of retainer. This was shown in particular by personal injury firms, who were more likely to resolve issues at Early Resolution, and probate firms, who were not.

It was also notable that complaints raised during an ongoing retainer were more likely to be dealt with through Early Resolution. When asked, participants referred to the informal approach being better for consumer relationship management.

A significant focus of the Pilot was the collection of qualitative feedback. This was because we wanted to ensure a strong bank of detailed feedback from service providers on the content and useability of the MCRP.

Not all of the Pilot service providers received complaints during the Pilot period. Our approach therefore also ensured that we were able to collect feedback from those service providers to add to the data we collected from participants who received complaints.

Capturing Pilot feedback – discussions and example complaints

A strong emphasis was placed on qualitative feedback throughout the Pilot. LeO met regularly with all participants, including those that did not receive complaints during the Pilot period. Standardised example complaints were also used to test how the MCRP would have been applied in practice. No significant concerns were identified.

All participants also completed an end-of-Pilot questionnaire, the results of which were used to refine the proposed guidance.

While consumers were invited to provide feedback, no responses were received. Consumer views will therefore be captured through the testing of the consumer-facing guidance.

Capturing Pilot feedback – Consumers

As part of the Pilot, all consumers whose complaints were addressed using the MCRP were advised of the Pilot and asked to complete a feedback form, as we were very keen to capture both service provider and consumer views, however we did not receive any responses from

consumer. Therefore, we will be seeking consumer views via the testing of our consumer facing guidance.

Post pilot development

The overall conclusion of the Pilot was that the MCRP and supporting materials are effective and workable across a diverse range of providers. Feedback gathered through the Pilot has informed the development of additional guidance and minor refinements to the language used in the procedure.