



OFFICE FOR LEGAL COMPLAINTS

DRAFT 2024-27 STRATEGY

CONSULTATION

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 LSB's 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.

About the OLC's draft 2024-27 strategy

The Office for Legal Complaints' strategy supports the regulatory objectives set out in the Legal Services Act, as well as the work of the Legal Services Board and aims and plans of the Legal Services Consumer Panel.

The OLC's strategy for LeO reflects the Ombudsman Association's (OA) well-established principles of effective ombudsman schemes. This includes the OA's new recognition criteria, which put learning from complaints and driving improvement as core defining features of ombudsman schemes.

This alignment reflects the OLC's duties under the Legal Services Act 2007. LeO also collaborates with a range of other stakeholders, including legal service regulators, to support the shared aim of improving outcomes for consumers using legal services.

The OLC's interim strategy, covering 1 April 2023 to 31 March 2024, articulates the OLC's intention to build LeO's impact in the legal services sector, by sharing more of its unique insight and constructive feedback on how to prevent legal service complaints arising and improve complaints handling.

The OLC's draft 2024-27 strategy continues this evolution, while ensuring LeO continues to improve the experience of consumers and legal service providers relying on LeO for a fair outcome to their complaint at the earliest possible stage. It will run from 1 April 2024 to 31 March 2027. The OLC's vision is for LeO to become a leading and trusted Ombudsman scheme, where every complaint helps drive better legal services.

Draft OLC strategy for 2024-27: overview

Purpose and what LeO is here to do					
Resolving consumer complaints about legal providers, and sharing insight to improve legal services					
Vision and where LeO is heading					
A leading and trusted Ombudsman scheme where every complaint helps drive better legal services					
Strategic objective for LeO's service			Strategic objective for LeO's impact		
LeO resolves complaints fairly and effectively, providing an excellent customer experience			LeO's independent voice and experience lead to improvements in legal services		
Aims			Aims		
We will deliver an efficient and proportionate service	We will give fair, high-quality outcomes that make a difference	We will be accessible to everyone who needs us	We will build LeO's profile and impact as an independent voice for improvement	We will share learning and insights that help lead to better legal services for consumers	We will use our experience to help legal providers improve their complaints handling
Enablers					
People and culture					
Funding and resources					
Systems and intelligence					
Relationships and collaboration					
Supporting strategies					
People					
Equality, diversity and inclusion					
Future ways of working					
Technology and innovation (proposed)					
Knowledge and insight (proposed)					

Context for the OLC's 2024-27 strategy

In 2022/23, LeO ...

- Responded to 111,614 early contacts and enquiries from consumers with a query or complaint about legal services
- Took on 7,824 new complaints for investigation
- Resolved 9,487 complaints (compared to 6,576 complaints resolved in 2021/22). Resolved over half (57%) of these complaints through early resolution.

Of the new complaints LeO accepted ...

- 31.3% involved residential conveyancing
- 14.4% involved wills and probate
- 10.7% involved personal injury
- 9.9% involved family law
- 9.7% involved litigation
- 24% involved other legal services

LeO found ...

- Around 4 in 10 consumers had contacted LeO before telling their legal service provider about their complaints
- There was evidence of poor service in 60% of cases resolved by ombudsmen's final decisions (56% in 2021/22; 55% in 2020/21)
- Service providers' complaint handling wasn't good enough in 45% of cases (38% in 2021/22 and 32% in 2020/21)

In the legal sector ...

- 31% of consumers have an unmet legal need
- Reputation (for 83% of consumers), along with price (81%), are the most important factors for consumers when choosing a provider
- Only 58% of consumers said it was easy to find information about complaining to an ombudsman
- 26% of people who were dissatisfied with the service they received from a legal provider did nothing
- All consumers who participated in LSB research said they felt at a disadvantage when they needed to use a legal professional, and two thirds had additional risk factors for vulnerability
- 37% of law firms expect artificial intelligence to help with improving communications with clients

Sources

<https://reshapinglegalservices.org.uk/>

<https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2023/07/How-consumers-are-choosing-legal-services-report.pdf>

<https://www.legalservicesconsumerpanel.org.uk/wp-content/uploads/2023/07/How-consumers-are-using-legal-services-report.pdf>

<https://legalservicesboard.org.uk/research/consumer-vulnerability-research-june2022>

<https://www.thomsonreuters.com/content/dam/ewp-m/documents/thomsonreuters/en/pdf/reports/future-of-professionals-august-2023.pdf>

Draft strategic objectives

Strategic objective for LeO's service

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

The outcomes we are aiming for over the strategy period

- LeO resolves complaints within timeframes that reflect excellence within the dispute resolution landscape.
- LeO is seen as a leading ombudsman scheme in its innovative approach to resolving complaints.
- LeO has an improved understanding of its customers – who they are, what they care about and how we can meet their needs – helping guide the evolution of our service.
- There is greater awareness of LeO among those who may need to use us – and higher consumer confidence in engaging in legal services.

Strategic aims under this objective

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 to how it works, so it's increasingly efficient and provides good value for money.

Over the course of the strategy, our areas of focus will include ...

- Sustaining a high level of performance, including acceptable waiting and investigation times.
- Developing flexible systems and processes that support an excellent customer experience and enable us to gather richer customer insight.
- Consulting on further changes to our Scheme Rules that will support greater proportionality, pragmatism and efficiency, including where this requires legislative change.

- Developing a culture of continuous improvement, learning from customer feedback and service complaints to improve what we do.
- Supporting a culture of staff-led innovation, building on the success of this in transforming our process.
- Engaging with and learning from other organisations to ensure we are in step with best-practice in how our service is delivered.
- Exploring how technology, including artificial intelligence, can help us achieve efficiencies and value for money, as well as excellent customer service.
- Developing a strategy for using and investing in technology and innovation during the strategy period and beyond.

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

Over the course of the strategy, our areas of focus will include ...

- Further developing and strengthening our quality framework, to ensure we are providing an excellent service and high-quality outcomes at all stages of our process.
- Ensuring our quality assurance arrangements are proportionate and appropriate as our service continues to evolve.
- Improving our understanding of customers’ experience and expectations of us throughout their time with LeO.
- Continuing to draw on and expand the range of customer feedback and best practice we draw on to inform improvements to our service.

We will be accessible to everyone who needs us

This strategic aim is about *who* LeO delivers its service for – users and providers of legal services. 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.

Over the course of the strategy, our areas of focus will include ...

- Contributing to work to better understand 'silent sufferers' and removing barriers to redress, and developing relationships with organisations with a wider consumer reach.
- Developing our equality, diversity and inclusion strategy, so customers' needs are at the heart of the service we provide.
- Ensuring our people have the skills they need to identify and respond to customers' needs and vulnerable circumstances.
- Expanding the range of channels we use to communicate with our customers.
- Considering how we can better use technology to enable those who can self-serve to do, so while continuing to support those who need our input.

Strategic objective for LeO's impact

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

The outcomes we are aiming for over the strategy period

- LeO's insights inform a regulatory framework and standards that work better for everyone.
- Greater awareness of LeO, its value and its impact, as evidenced through surveys and feedback from consumers, the legal sector and other key stakeholders – including higher consumer confidence in engaging with legal services.
- A shorter timeframe between identifying trends in complaints or complaints handling and alerting consumers or the legal sector – meaning issues are resolved quickly rather than escalating and causing wide-scale detriment.
- Not necessarily fewer complaints, but a positive shift towards complaints being resolved at the earliest appropriate point, with or without LeO's intervention.
- Improved quality of tier one complaints handling, resulting in changes in the nature and complexity of complaints reaching LeO.

Strategic aims under this objective

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.

Over the course of the strategy, our areas of focus will include ...

- Building and strengthening strategic relationships, including with regulators, rooted in a shared interest improving legal services.
- 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.
- Proactively seeking opportunities to contribute LeO's unique insight to policy discussions in legal services and beyond.
- Establishing relationships with the media and a stronger presence on other platforms and channels, ensuring LeO is reaching those who'd benefit from its insight and experience.

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.

Over the course of the strategy, our areas of focus will include ...

- Being a key strategic partner of the Legal Services Board in driving better legal services.
- Delivering more timely insights into what needs improving – rooted in evidence around what LeO is seeing going wrong.
- Ensuring we are using the right channels and platforms to influence those who need to take action.
- Ensuring we have the systems, intelligence, governance and culture we need to deliver on our ambitions.
- Growing our understanding of the impact of our interventions – testing and refining our approach based on what works.
- Ensuring this work is properly and sustainably funded going forward, reflecting its centrality to LeO's role and stakeholders' clear appetite for more.
- Developing our people's roles so that they blend the resolution of complaints with the identification of learning and insight.
- Collaborating with others on learning, insight and transparency initiatives in the legal sector.

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.

Over the course of the strategy, our areas of focus will include ...

- Playing a central role in the LSB's programme of work on first-tier complaints – making it clear where improvements are required to raise standards in redress and complaints handling.
- Developing best-practice standards and kitemarks of good complaints handling.
- Reviewing and developing the training LeO offers the legal sector around good complaints handling, ensuring it is addressing the right areas and the right audiences at the right time.
- Exploring further services we could offer the legal sector, such as complaints handling audits and targeted interventions or support.
- Establishing how to fairly and sustainably fund these types of interventions, in view of the clear business case for a preventative, "invest to save" approach.

Strategic enablers

Enablers are the capabilities we need to fulfil our purpose, achieve our objectives and move toward our vision

People and culture

- A talented workforce, motivated by a strong and distinct employee value proposition and supported by a comprehensive People Strategy.
- The right blend of technical and 'soft' skills needed to get to the root of customers' concerns and resolve complaints effectively.
- Roles and responsibilities that blend resolving complaints and learning and insight, reflecting our two core strategic objectives.
- Expertise in identifying and responding to customers' needs, including those in vulnerable circumstances.
- An equal, diverse and inclusive culture, with ways of working that support both productivity and wellbeing.

Relationships and collaboration

- A key strategic partnership with the LSB, where our insights inform and influence a regulatory landscape that supports legal services that work for everyone.
- A strong relationship with Legal Services Consumer Panel, ensuring ongoing alignment.
- Strategic relationships with legal service regulators, including shared ownership around a culture of learning.
- A mature ongoing dialogue with legal service providers and their representatives about what's working well in legal services and what needs to change.
- Effective relationships with consumer bodies, other Ombudsman schemes and others with a shared interest in a better legal sector and consumer redress.

Systems and intelligence

- New and enhanced customer engagement channels.
- The ability to capture customer feedback at all stages of LeO's process.
- Robust business and management information that enables us to make sound data-led decisions about people and resources.
- Systems and culture that support better capturing and sharing of the insight from complaints.

Funding and resources

- A stable level of resourcing that recognises and reflects shared ambitions and appetite for the Legal Ombudsman being an independent voice for improvements in legal services.
- A sustainable balance of case fees and levy income, focused on a providing value for money service.
- A greater proportion of our funding being directed to learning, insight and engagement, reflecting the benefits this brings for legal services and legal providers.
- The ability to be more strategic through longer-term funding settlements.