Supporting consumers with reasonable adjustments

Model Complaints Resolution Procedure

Version

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1.0	First release of guidance	29 July 2026

Introduction

This guidance is intended to help lawyers deliver fair, accessible and effective complaint handling where a consumer has asked for, or may need, reasonable adjustments.

Although this guidance is intended to support good complaints handling, it can also be used to support wider service provision.

Importantly this guidance is specifically intended to support service providers to offer a reasonable level of service and complaints handling.

Good complaint handling in cases where a consumer needs reasonable adjustments is not only about following process. It is about removing avoidable barriers, responding to individual need, communicating with care and making sure the consumer can participate fully in the complaints process.

Ensuring you are aware of and have met a consumer's reasonable adjustments also reduces the possibility of rework, or additional complaints, which may arise if a consumer's reasonable adjustments are not taken into account from the outset of any complaints process.

Key principles

The overarching principle is ensuring that all consumers can equally use your complaints procedure. To do this you should:

- Make accessibility part of the complaint process from the outset, not an exception at the end.
- Ask early and sensitively whether the consumer needs any adjustment to communicate or engage with the process.
- Do not assume that a consumer will know what to ask for or feel comfortable asking.
- Respond to the individual, not just to the diagnosis or label.
- Record agreed adjustments clearly and apply them consistently.
- Use plain, respectful language and avoid jargon where possible.
- Keep the complaint process flexible where this is needed to avoid disadvantage.
- Review whether the adjustments provided are actually working for the consumer.

Identifying and agreeing reasonable adjustments

Lawyers should make it as easy as possible for consumers to say they need support.

The best time to do this is at the start of the retainer.

There are a range of supportive ways consumers can be asked about their needs, for example:

> *"If there's anything we can do to make your experience easier or more comfortable, please let us know."*
>
> *"We're happy to make adjustments if you need them — is there anything that would help you today?"*
>
> *"We ask all our consumers — do you need any adjustments or support to help you access our services, for example we can provide communication in a larger font, or agree to communicate using a specific method?"*

The question should also be repeated at the outset of the complaints handling process, this ensures that nothing has changed for the consumer, and that any requirements are clearly known about and agreed before the complaint is responded to. This is particularly important as consumers making a complaint can be situationally vulnerable.

Examples of reasonable adjustments in complaints handling could include:

- Communicating by telephone instead of only in writing.
- Providing letters or complaint responses in plain English, large print, different colour contrast, or an alternative format.
- Giving the consumer more time to provide information or respond.
- Accepting a complaint orally, by voice note, or through a representative where appropriate.
- Arranging a named point of contact to avoid the consumer having to repeat information.
- Breaking complex issues into shorter stages or clearer summaries.
- Scheduling calls at a time of day that better meets the consumer's needs.
- Confirming key points after a conversation in an accessible format.
- Allowing support from a family member, carer, advocate or other representative where appropriate.

This list is not exhaustive but gives some practical examples of adjustments consumers may need.

Importantly, agreeing reasonable adjustments also means that the adjustments requested are also considered, and where appropriate, confirmed.

This means that there is a clear record of what the consumer has asked for, and what the lawyer has agreed they will do.

If you believe a requested adjustment is not workable, you should clearly explain why that is the case and, where possible, offer an alternative.

The importance of good communication

Complaint communications should always be clear, respectful and tailored, but it is even more important where a consumer has reasonable adjustments.

There are a number of ways you can ensure your communications are accessible for all:

- Avoid overly technical language.
- Use short sentences.
- Avoid dense paragraphs.
- Use plain, clear English, and avoid any unexplained legal terms or jargon.
- Consider using bullet points, or headings to break up text.
- Consider font, format and contrast of any written text.

Specific considerations for complaint responses include:

- Clearly set out the complaint and whether each issue is upheld or not upheld.
- If you need to address very complex issues, consider a short initial summary.

Early Resolution

The Early Resolution stage can be suitable for all consumers, but some consumers may require additional support and explanations. This of course does not mean you should not offer Early Resolution, but that you should ensure the consumer understands the process, and importantly, that if they do not agree any proposed resolution that they can request a Full Investigation.

How to make the Early Resolution stage accessible for consumers with reasonable adjustments:

- Provide the consumer with a link to LeO's consumer guidance on the MCRP.
- At the beginning of any Early Resolution phone call confirm that the consumer's recorded reasonable adjustments are up to date and that they do not need anything further.
- Ensure that the consumer clearly understands that an agreement will bring an end to their complaint and will be confirmed in writing.
- If necessary, provide extra time for the consumer to provide information, or to accept any proposed resolution.

Making reasonable adjustments in early resolution

Ms C complained to Chambers that her direct access barrister's communication was poor as he had not acknowledged or responded to a number of emails and attachments she has sent him to consider. Chambers reviewed the complaint and considered that it may be suitable for Early Resolution.

They arranged to speak to Ms C, and at the outset of the call asked her if she had any reasonable adjustments. Ms C confirmed that she is dyslexic and so needs simple, clear language in any written response.

During the call, Chambers apologised that the barrister had not replied, but confirmed he had reviewed the information, and incorporated it into his advice. Ms C was happy that the material had been reviewed and considered and was content to accept the apology as a remedy. Ms C also explained that as she also has anxiety, she needs correspondence to be acknowledged. Chambers confirmed that this adjustment would be put in place moving forwards. They then confirmed the resolution in a short, bullet point email, which Ms C confirmed she had received, understood and that she was content to accept the resolution.

Full Investigation

Where a consumer has reasonable adjustments, you should consider what adjustments can and should be made, if a complaint passes to Full Investigation.

In addition to the communication approaches set out above, specific adjustments here could include:

- Extra time to provide information.
- Breaking up the complaint into smaller pieces.
- Offering a phone call to explain the final response.
- Offering the opportunity to use a representative.

Making reasonable adjustments at Full Investigation

Mr L had instructed the firm in a personal injury matter. He complained to the firm about the time taken to progress his matter, and the time taken to arrange medical treatment. Mr L also complained that the firm's communication did not meet his requirements.

The firm acknowledged the complaint and decided to pass it to Full Investigation as they wanted to produce a detailed chronology of the matter, which had been ongoing for some time. In that acknowledgement the firm asked Mr L what his requirements are.

Mr L explained that he was autistic and as a result needed direct and clear communication, which did not use words that could be misinterpreted.

In their final response, the firm clearly set out each of Mr L's complaints, with a short summary of their conclusions in a box under each complaint. They also provided an overview chronology of the matter.

The firm upheld Mr L's complaint about communication, as they accepted the case handler had not asked Mr L about reasonable adjustments at the outset of the matter, despite Mr L making it clear he needed communication in a specific format. The firm also accepted that whist the delays were not down to them, they hadn't reasonably kept Mr L informed of the issues. To resolve his complaint the firm offered £300, explaining that this was a significant category remedy to take account of the additional impact on Mr L of receiving correspondence that he found difficult and distressing to deal with. Mr L accepted that offer and the complaint was resolved at first tier.

A practical checklist

Importantly every consumer is different and so each individual’s needs should be considered on an individual basis. This checklist can help you ensure you’ve explored, confirmed and implemented any reasonable adjustments:

- ✓ Ask early whether the consumer needs any adjustment, including giving examples.
- ✓ Agree practical steps with the consumer wherever possible.
- ✓ Record adjustments clearly and apply them consistently.
- ✓ Use plain, respectful and accessible communication.
- ✓ Review timescales and process steps where flexibility is needed.
- ✓ Address any adjustment issues openly in the complaint response.
- ✓ Capture learning and improve systems, templates and staff training.