LEGAL OMBUDSMAN

Model Complaints Resolution Procedure

Call for input response document

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 In too many cases, outdated or inconsistent procedures mean that small matters escalate unnecessarily, increasing pressure on staff and leaving consumers feeling unheard.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.

While voluntary, LeO considers that adoption of the MCRP has clear benefits: it has the potential to reduce the time and cost associated with complaints, improve resolution rates, and deliver better outcomes for both service providers and consumers.

Following a successful pilot with a small number of firms over the summer of 2025, LeO undertook a Call for Input on the draft model and supporting guidance. This sought to ensure the model would work effectively across the sector, and to identify where refinements or additional support might be needed to enable service providers to adopt it with confidence.

Responses demonstrated broad and consistent support for the MCRP and its underlying objectives. Responses highlighted the value of a structured approach to complaint handling, with a strong emphasis on early resolution and the use of practical tools to support consistency. We also received feedback on what further guidance is required to support effective adoption.

As a result, targeted refinements to both the MCRP process and the supporting guidance have been made, alongside the development of a range of additional resources to support implementation.

This document sets out the key themes identified through the Call for Input and explains how we have responded, including the changes made to the MCRP and the additional support developed to facilitate implementation.

Who we heard from

The Call for Input ran from 24 March 2026 to 19 May 2026. During this period, we invited views from stakeholders across the sector on the draft model and supporting guidance.

A total of 19 written responses were received from a broad range of interested parties, including regulators, professional bodies, individual service providers, consumer organisations and other stakeholders.

Organisation	Responses received
Regulators	5
Professional/representative bodies	3
Individual service provider	8
Consumer organisations	2
Other	1

Ahead of the Call for Input, we held a consumer workshop in November 2025 to better understand consumer experiences and expectations. Hearing directly from those who represent consumers about how the MCRP can support accessibility was a key consideration.

We also held a series of webinars for small and medium firms, large/volume firms, and a general webinar for others from across the sector to attend. We also met with representatives from professional bodies, such as the Law Society, Bar Council and Society for Licensed Conveyancers to hear their views on the proposals and how they could support their members.

While the MCRP is designed to support service providers to resolve complaints more efficiently and appropriately, it is equally important that it works effectively for the wide range of consumers who engage with legal services. These insights have informed refinements to the MCRP and the development of more accessible, consumer-focused guidance.

The Call for Input was promoted through across LeO’s social media channels, on our website, and was shared by others from across the sector.

We are grateful to all respondents for their contributions. Each response has been carefully considered. This feedback has directly informed the development of our model and supporting guidance.

What we heard and what we’ve done in response

Respondents expressed broad and consistent support for the MCRP, often highlighting its potential to improve both the consistency and overall quality of complaint handling across the sector. Many responses reflected a shared view that a clear, structured model could also help to reduce variation in approach and support more effective resolution of complaints at an earlier stage.

In particular, respondents welcomed:

- A simplified, structured approach to complaint handling, which was seen as helping to provide clarity for both service providers and consumers.
- A strong emphasis on Early Resolution, recognising the benefits of addressing issues promptly before they escalate.
- The use of templates, guidance and supporting materials to promote consistency and support implementation in practice

While there was clear support for both the aims and structure of the MCRP, respondents also provided detailed and constructive feedback on how it could be further strengthened. This feedback reflected a strong engagement with the proposals and a shared interest in ensuring the model is both practical and effective in real-world settings.

Suggestions for improvement centred on two key areas:

1. The need for additional, practical and scenario-based guidance to support consistent implementation.
2. Targeted refinements to the process itself, to ensure it is sufficiently flexible and workable across different regulatory, organisational and operational contexts.

Taken together, these responses highlight both strong support for the direction of the MCRP and a clear expectation that it should be underpinned by detailed guidance and adaptable to the diverse needs of the sector.

The feedback that follows has been grouped by theme according to the process and the associated guidance. It focuses on where changes have been made in response to feedback, as well as areas where no changes have been implemented and the rationale for this.

The MCRP process

Stronger alignment with regulatory requirements

A number of responses highlighted concerns that the model and guidance as drafted were not explicit enough in requiring service providers to recognise their regulatory obligations. This is particularly important given the diversity of the sector and the different requirements each regulator has in place. Respondents also emphasised the importance of ensuring that the MCRP does not inadvertently create false assurances. It is important that the MCRP is not seen as providing an automatic guarantee of compliance with regulatory requirements. While the framework has been designed to support effective complaint handling and align with regulatory expectations, service providers remain responsible for ensuring their complaints processes comply with their own regulatory obligations and deliver good consumer outcomes

What have we done in response

A key change that has been made in response to the concerns outlined has been the systematic strengthening of language throughout the framework. Where appropriate, advisory wording such as “should” has been replaced with more directive language, including “must”, in order to emphasise mandatory expectations and reinforce the importance of adherence to relevant regulatory rules and obligations. This shift reflects stakeholder concerns that the previous tone and language did not sufficiently convey the level of rigour required in regulated environments.

In parallel, regulatory requirements have been more explicitly embedded within the guidance. This includes clearer articulation of how MCRP steps relate to existing obligations under the regulatory frameworks. Where possible, the guidance now highlights differences between regulatory obligations to acknowledge the diversity of requirements across the sector, while maintaining a consistent overarching structure. We believe this approach better balances the aim of greater standardisation with the reality of regulatory variation.

Importantly, the revised guidance makes explicit that the use of the MCRP does not, in itself, ensure regulatory compliance. This clarification responds directly to stakeholder concerns that the MCRP could otherwise be interpreted as a proxy for compliance assurance. The guidance document now clearly distinguishes between supporting good practice and meeting formal regulatory obligations. Consideration has also been given to the potential need for more tailored or modular approaches, including regulator-specific overlays or annexes, to address areas.

Early Resolution stage

An important component of the MCRP is its Early Resolution stage. This not only encourages service providers to seek to resolve the complaint at the earliest opportunity, but it also recognises that consumers don’t often want to go through lengthy complaint processes; they often just want to have their concerns heard and responded to.

Responses to the Call for Input were overall supportive of this stage and was widely seen as having a high potential to reduce burden and improve outcomes for both parties.

Some service providers felt that the 10-day timeline for early resolution was overly prescriptive and, in some cases, may be unrealistic. There was therefore a call for greater flexibility of approach, ensuring that whilst the Early Resolution stage remained a key component, the length of time allocated to this stage could vary according to the firm's preference or requirements.
There was also a clear ask for more supporting guidance to be available to provide clarity on when Early Resolution is appropriate and when it is not – and how to evidence outcomes and agreement. This could be supported through additional guidance and case studies, to evidence good and base use of the Early Resolution process.

What we have done in response

The recommended timescale for attempting Early Resolution remains 10 working days. However, the guidance has been updated to clarify that this is indicative rather than prescriptive. Service providers retain discretion to determine the appropriate duration for Early Resolution activities, provided these are conducted within the overall permitted timeframe set out in the process. This change is intended to offer greater flexibility, recognising the varying complexity of cases and operational contexts, while maintaining a clear expectation that Early Resolution should be pursued promptly and proportionately.

Additional guidance and case studies have also been included to give clearer indications of how the Early Resolution process should work in practice and the limitations service providers need to be aware of. Further detail on what additional guidance has been included can be found further down in this response.

Process efficiency and flow

From our experience of handling complaints, we know that complaints processes can sometimes be lengthy, complicated and confusing. It's important that improvements in complaint handling are rooted in greater process efficiency and flow. Responses were also broadly supportive of efforts to simplify and streamline the process, particularly the move towards clearer stages and a single final response.

However, we did hear concerns about the risks of duplication and increased administrative burden, especially for small firms and high-volume providers. A recurring theme was a lack of clarity around how the process operates in practice, including when timeframes begin, how rigid they should be, and how they apply to more complex or evolving cases. Respondents also raised challenges in managing complaints alongside parallel issues, such as ongoing legal matters and other procedural requirements.

What we have done in response

In response to this feedback, we have refined the process to improve clarity within the process and guidance, which we anticipate will reduce unnecessary duplication, and help manage complaints more effectively in practice. We have strengthened the guidance to clearly distinguish the activities expected at each stage to help minimise overlap between Early Resolution and Full Investigation and reduce the risk of repeated steps.

We have also clarified that service providers can confirm the scope of a complaint before commencing a full investigation, reflecting existing good practice and providing greater control at the outset of the process. In addition, we have introduced greater flexibility in how more complex complaints are managed. While complaints must still be responded to within the maximum timeframe permitted by the relevant regulator, the guidance now includes additional support on handling cases that may require a more nuanced or extended approach.

Definitions and scope

A consistent theme in stakeholder feedback was the lack of clarity around what constitutes a complaint. Many respondents felt that the current definition creates uncertainty for both consumers and service providers, with some viewing it as too broad and potentially increasing administrative burdens. Others highlighted inconsistencies with definitions used elsewhere in the legal sector, including by regulators, which they felt could create confusion and duplication.

Stakeholders also called for clearer distinctions between different types of issues. In particular, they highlighted the need to differentiate between issues relating to service and those relating to conduct, and between matters that are within a firm's control and those that are not. Some respondents suggested that a lack of clarity at this stage can lead to complaints entering a firm's complaints process unnecessarily or being handled inconsistently.

Respondents therefore asked for more practical guidance to support decision-making. This included requests for worked examples, clearer descriptions of what should and should not be treated as a complaint, and guidance on issues that fall outside the scope of a firm's complaints process, such as matters relating to insurers or other third parties.

What we have done in response

We have proposed amendments to the definition of a complaint in our recent consultation on changes to our Scheme Rules. These changes focus on consumers being clearer about the detriment they have incurred because of a service failing. This is presently a consultation, but we have ensured our MCRP guidance is fit for purpose for both the current and possible future Scheme Rules.

Some of the challenges expressed by respondents are not solely related to the wording of the definition itself, but the varying ways in which it is understood and applied across the sector. We therefore believe that clarifying the definition alone will not address all the concerns raised.

To support more consistent interpretation and application, we are instead developing a range of supporting materials alongside any future changes to the definition. This includes updated guidance and practical examples to help service providers understand what should and should not be treated as a complaint in different circumstances. We are also producing a video resource to provide further clarity and support implementation in practice.

We know that the definition point is not just feedback LeO has received, and has been a consistent theme heard by regulators too, as part of the consultation on changes to first-tier requirements. We are continuing to work with regulators to improve consistency across the sector and this will remain a focus for future discussions.

Consumer engagement and expectations

It was clear from the responses that respondents understood the importance of communication and setting expectations early in the consumer journey. There was strong agreement that consumers should be kept regularly updated and that ongoing communication is valued throughout the service being provided. This includes ensuring consumers are informed even at points when cases are not actively progressing through Early Resolution, helping to reduce uncertainty and frustration.

However, stakeholders noted that this is not always straightforward, particularly when dealing with more challenging behaviours, such as consumers who refuse to engage appropriately. This adds complexity to efforts to maintain constructive dialogue and resolve issues efficiently. Similarly, some service provider responses felt that improvements could be made if consumers made their service provider aware that they were taking their complaint to LeO.

We also received suggestions for improving a consumer's engagement with the service provider, with respondents also calling for more accessible guidance in different formats, such as videos and checklist, and for tools that help consumers articulate their complaints more clearly. These were seen as ways to both empower consumers and improve the quality of information received. We have outlined more about this separately below.

What we have done in response

In response, we have taken steps to reinforce the importance of timely engagement. While we have not introduced formal deadlines for consumers – something which we cannot do as an organisation and have no control over – we have published consumer-facing guidance explaining why it is important to respond within the timescales set by service providers. We have also provided guidance for service providers on how to manage complaints where consumers do not respond or fail to meet relevant timescales.

Requiring consumers to notify service providers if they intended to escalate their complaint to LeO is not a requirement that we can enforce. We have instead included clearer encouragement for greater transparency at the end of the first-tier process by advising service providers to ask consumers what action they intend to take once the complaints process has concluded.

MCRP guidance

A consistent and strongly evidenced theme across consultation responses was the need for more detailed, practical and scenario-based guidance to accompany the MCRP. Stakeholders across all groups emphasised that, while the principles of the framework are broadly supported, there is a need for greater clarity and operational detail to support consistent interpretation and implementation in practice.

Across responses, stakeholders identified a number of priority areas where additional guidance would add significant value. These included clearer definitions of what constitutes a complaint, particularly where issues may fall outside a provider's control, as well as practical distinctions between complaints, concerns and other forms of feedback. There was also a clear call for guidance tailored to vulnerable consumers, especially in the context of early resolution, where identifying and responding to additional needs can be more challenging.

Respondents highlighted the importance of strengthening and testing consumer facing materials. This included the need for accessible resources to help consumers articulate clear and effective complaints, alongside clearer explanations of the respective roles of legal service providers, regulators and the Legal Ombudsman. Many stakeholders also emphasised the value of practical examples and case studies to illustrate what good complaint handling looks like in practice, particularly in relation to evidence, remedies and the characteristics of an appropriate response. Greater clarity on expected timescales, and how to approach more complex or protracted complaints, was also seen as critical.

Perspectives from different stakeholder groups

While there was broad alignment on the overall need for enhanced guidance, stakeholders emphasised different aspects depending on their role within the system:

Regulators – focused on the importance of ensuring that the MCRP is clearly aligned with existing regulatory frameworks and requirements. They highlighted the need for clearer articulation of how the MCRP supports regulatory compliance, alongside more detailed guidance on core concepts such as what constitutes a complaint. Regulators also emphasised the importance of embedding consideration of vulnerability throughout the framework, and called for accessible consumer guidance supported by testing to ensure its effectiveness in practice.

Legal service providers and professional/representative bodies – sought more detailed, operational guidance to support day-to-day implementation. This included practical scenarios covering complex or multi-issue complaints, cases where allegations are not clearly defined, and situations where consumers are reluctant to engage formally. Providers also highlighted challenges in dealing with difficult or intransigent behaviour, and the need for guidance on managing these interactions constructively.

There was also strong demand for greater process and procedural clarity, including when the eight-week timeframe begins, how to manage extensions or ongoing complaints, expectations around evidence and the content of responses, and what constitutes a reasonable standard of service. In addition, providers identified a need for guidance on more specialist or emerging issues, such as complaints involving AI or automated decision-making, Data Subject Access Requests (DSARs), and cases involving third parties.

Representative and consumer-focused organisations – emphasised that the MCRP should be as clear and accessible for consumers as it is for service providers. Feedback highlighted a need for clearer guidance on what constitutes a complaint, what falls outside the complaints process, and how complaints relating to service differ from concerns about professional conduct. Consumer responses also called for guidance to help consumers raise clear, structured complaints and suggested that sector-specific examples, such as for conveyancing, would help improve understanding and consistency.

What we have done in response

In response, we have reviewed and updated the existing guidance to address the issues raised, improving clarity, strengthening explanations and ensuring closer alignment with stakeholder expectations. A key focus has been increasing the use of practical examples and case studies to illustrate how the framework should be applied in real-world scenarios. We will continue to expand and refine these materials over time to reflect emerging issues and good practice.

Alongside these updates, we have developed a suite of new and enhanced guidance materials targeted at the areas most frequently identified by stakeholders. These include guidance on supporting vulnerable consumers throughout the complaints process, as well as more detailed material on handling complex complaints, including those involving DSARs and AI or automated systems.

We have also introduced guidance to support providers in managing challenging or unreasonable behaviour, as well as more specific advice on issues such as outstanding costs and liens, and tailored guidance for barristers and chambers to reflect the particularities of their operating models.

To support earlier and more effective resolution, we have developed practical toolkits focused on key elements of good complaint handling. This includes a toolkit to support early resolution, alongside guidance on what constitutes reasonable service in relation to delays and communication. In addition, we have produced a toolkit aimed at helping organisations embed learning from complaints, reinforcing a culture of continuous improvement.

We have also developed new consumer-facing guidance materials, which were drafted by a consultant, and which have been tested and revised with support from a consumer organisation and their consumer testing group. There is a new template letter to support consumers wanting to complain, as well as supporting guidance on what the MCRP means for consumers and how to complain, with a focus on resolution, not escalation. All the documents have been developed to be accessible and easy to use.

List of new guidance produced

- Supporting vulnerable consumers during the complaints process
- Guidance on dealing with complex complaints, SARs and AI
- Guidance on dealing with unreasonable behaviour

- Guidance on outstanding costs and liens
- Guidance for barristers and chambers
- Guidance on acceptable tailoring of the MCRP to fit for an individual service provider
- Toolkit to support Early Resolution
- Toolkit to on reasonable service in respect of delay and communications
- Toolkit on embedding the learning