

Minutes of the 141st Meeting of the Office for Legal Complaints (OLC)

Thursday 25 September 2025

Present Elisabeth Davies, OLC Chair Elaine Banton Georgina Philippou Rachel Cerfontyne Hari Punchihewa (items 1 and 2) Patricia Tueje Alison Sansome	In attendance Paul McFadden, Chief Ombudsman Steve Pearson, Deputy Chief Ombudsman Laura Stroppolo, Head of Head of Programme Management and Assurance Blessing Simango, Head of Finance, Procurement, and ICT Mike Harris, Head of Communications, Engagement, and Impact David Peckham, Head of Operations, Business Transformation, and Intelligence Zoe Grainger Head of People and Culture Sarah Gilbert, Strategic Engagement Manager, item 2 (annual horizon scanning), and item 3 Kavita Nagra, Strategic Programme Manager, item 2 (2026/27 budget and business plan)
Minutes Kay Kershaw, Board Governance Manager	

Item 1 - Welcome, apologies, declarations of interest and other preliminary matters

1. The Chair welcomed attendees to the meeting, noting that this would be the last meeting for the Chief Ombudsman who would be starting a new role in October.
2. There were no apologies.
3. The meeting was quorate with a lay majority.
4. There were no declarations of interest reported.

Item 2 – 2026/27 Budget and business planning workshop

5. As part of the annual strategic cycle, and following the Board’s risk workshop in July, Board members participated in a dedicated strategic planning workshop to support the

development of the 2026/27 budget and business plan and the successful delivery of the OLC's 2024/27 Strategy.

6. The workshop was structured onto two sessions, each having a central focus on demand.
7. The first workshop session on horizon scanning, aimed to explore and understand current and emerging drivers of demand, including those that had not yet materialised but were visible on the horizon.
8. In discussion, Board members:
 - Reflected on an analysis of demand across the ombudsman and legal sectors alongside a multi-dimensional view of political, economic, consumer, technological and legal factors influencing demand and considered the opportunities and challenges they presented.
 - Reflected on cross-sector challenges linked to rising levels of demand and increasing complaint complexity. It was noted that rising levels of demand may partly be driven by the use of artificial intelligence which may also influence how complaints are framed, leading to a possible increase in their complexity.
 - Considered additional factors that may influence complaint volumes and customer experience, including the impact of high-volume mass claims.
 - Reflected on which drivers of demand were most significant and should be prioritised for ongoing monitoring by LeO.
9. The second workshop session focussed on the strategic development of 2026/27 budget and business plan.
10. In a detailed discussion, Board members evaluated four proposed budget options and their implications for delivering a business plan for 2026/27 which would meet the strategic aims of the final year of the 2024/27 OLC Strategy. Multiple factors were considered by the Board, including:
 - Feedback from the Legal Services Board (LSB) provided during a recent Board to Board meeting on the OLC's budget submission for 2026/27.
 - Insights from the Ministry of Justice (MoJ) on the political appetite for budget increases across Arms Length Bodies.

- Reflections from the Chair of the Performance Sub-Group (PSG) on the implications of increasing levels of demand on performance trajectories.
- Outcomes from the previous Board discussion on horizon scanning.
- Realistic business plan deliverables within the scope of the budget options.

11. Board members provided feedback on the four proposed budget options and the feasibility of business plan deliverables within the scope of each budget option.
12. The Board discussed the benefits of adopting a multiple year strategic approach to budget and business planning, recognising its potential to support more radical solutions for meeting rising demand and enhancing service levels for LeO's customers over the long term.
13. It was agreed that the draft 2026/27 budget and business plan would be refined by the Executive to reflect the Board's feedback, ahead of its submission, along with the draft LSB Budget Acceptance Criteria and the budget and business plan consultation document, for the Board's approval at the October Board meeting.
14. The approved draft budget, Budget Acceptance Criteria and consultation document were to be shared with the LSB Board for consideration at its November meeting.

Item 3 – Stakeholder insight

15. The Board received a presentation on stakeholder mapping delivered by the Head of Communications, Engagement and Impact and the Strategic Engagement Manager.
16. The presentation had revisited a stakeholder map previously shared with the Board in October 2024. This map positioned stakeholders within an interest / influence matrix aligned to both of the OLC's strategic objectives and had informed targeted engagement strategies.
17. Recognising the critical role stakeholder relationships played in achieving strategic outcomes, a refreshed stakeholder map had been introduced for 2025. In addition to evaluating stakeholders' interest in and influence over the OLC's impact objective, the updated version incorporated sentiment analysis and would be used to assess perceived levels of support for the OLC's impact objective.

18. Whilst the limitations of sentiment analysis in capturing nuance were acknowledged, it was also recognised as a valuable tool for fostering more strategic thinking around stakeholder engagement. In particular, it helped identify the actions required to gradually shift stakeholders along the support spectrum towards advocacy. It also provided useful micro-level examples of progress, offering a practical way of measuring the effectiveness of the engagement strategy.
19. A case study was shared to illustrate a proposed engagement strategy for stakeholders identified as showing critical sentiment.
20. In discussion, Board members shared feedback on both the revised stakeholder map and the proposed stakeholder engagement approach. Suggestions included overlaying the map with stakeholder prioritisation and thematic areas such as demand. This feedback would be taken into account as the Executive continued to develop its stakeholder engagement strategy.

Item 4 – Case fee consultation

21. Following feedback received during the 2025/26 budget and business plan consultation on LeO's approach to revising case fees, a formal consultation was launched to gather views on a proposed inflationary case fee increase, from £400 to £600, and whether the case fee level should be subject to regular review.
22. The consultation closed on 10 September 2025 with responses received from a range of stakeholders, including professional representative bodies within the legal sector, regulators, service providers, and individuals.
23. The Deputy Chief Ombudsman presented a paper outlining the consultation feedback and the Executive's recommended approach to increasing the case fees, drawing the Board's attention to a renewed interest by some stakeholders for the OLC to explore alternative case fee models, such as the polluter pays principal or a differentiated stage model.
24. Reflecting on the case fee paper and taking into account earlier discussions held during the 2026/27 budget and business planning workshop, the Board noted that increasing the case fee to £600 would have a limited impact on LeO's overall budget and that

exploring alternative case fee models could offer a means of offsetting future increases to the professional levy contribution and mitigating increasing levels of demand.

25. The Board also reflected the broader implications of adopting alternative case fee models, both in the short term and longer term, noting that frequent changes to the case fee structure would impose a significant administrative burden on LeO and risk creating confusion within the legal sector.
26. Following a detailed discussion, and in the light of the Budget and Business Planning discussion, it was recommended that the Board should take the opportunity to explore the potential for a more fundamental reform of LeO's case fee structure, and the Board made a decision to withdraw the current case fee proposal and undertake a comprehensive review of case fee options over the next six months.
27. It was **agreed** that the Board would revisit the case for increasing case fees again in April 2026.
28. The LSB would be informed of the Board's decision and the implications for the OLC's 2026/27 budget submission.

Item 5 – 2025 Board and committee effectiveness review

29. Building on a discussion at April's Board meeting, which had focussed on the themes emerging from the Board's annual appraisals and the externally commissioned Board effectiveness review, the OLC Chair presented a follow up paper outlining the key learning points from the 2025 internal Board and Committee effectiveness review.
30. Having reflected on the Board effectiveness paper and the areas of strength and opportunities for development that had been identified, the Board make the following key points:
 - The minutes of Board and Committee meetings continued to be of consistently high quality and there had been notable improvements in the timeliness and quality of Board and Committee papers.
 - Board governance remained strong.
 - Board discussions were inclusive and comprehensive.

- It would be beneficial to allocate more time for informal Board discussions and training and development sessions. Given the limited time available, the Board may need to repurpose some of the time currently used for staff engagement, such as staff lunches, for this. Acknowledging the value of staff engagement, the OLC Chair and Head of People and Culture **agreed** to explore alternative approaches to ensure the Board continued to engage meaningfully with staff.

ACTION: The OLC Chair and Head of People and Culture to explore alternative approaches to ensure the Board continued to engage meaningfully with staff.

- Given the OLC's role in setting and overseeing LeO's objectives, the prevailing view was that these objectives were inherently shared and therefore there would be no value in the OLC setting strategic objectives that differed from those of LeO.
- The RemCo action plan arising from the Committee's 2025 effectiveness review would be completed by the end of the month.
- The Chair of the Performance Sub-Group (PSG) would review the findings of the PSG's 2025 effectiveness review to determine whether any follow up actions were required.
- The findings from the 2025 Board and Committee effectiveness reviews would be included in the handover pack for the incoming OLC Chair.
- Board members were asked to provide feedback to the OLC Chair on whether the current committee structure and the written updates provided by Committee Chairs after each meeting remained effective or whether alternative reporting methods should be explored to ensure the Board was appropriately informed of key discussions and decisions made.

ACTION: Board members to provide feedback to the OLC Chair on whether the current committee structure and the written updates provided by Committee Chairs after each meeting remained effective or whether alternative reporting methods should be explored to ensure the Board was appropriately informed of key discussions and decisions made.

31. The Board **noted** the update on the 2025 Board and Committee effectiveness review.

Item 6 – Previous minutes and actions and matters arising.

32. The Board **approved** the minutes of the OLC Board meeting held on 24 July 2025 for accuracy and for publication.

ACTION: The Board Governance Manager to arrange for the minutes of the Board meeting held on 24 July 2025 to be published.

33. The Board **approved** the minutes of the Public Interest Decisions Committee (PIDCo) meeting held on 20 May 2025 for publication.

ACTION: The Board Governance Manager to arrange for the minutes of the PIDCo meeting held on 20 May 2025 to be published.

34. The Board **noted** the update on actions from previous meetings and requested that the delivery date for action 5, para 21 from the April 2025 Board meeting was extended to 17 December 2025 to enable the Executive to give further consideration to how best to incorporate narrative on Value for Money (VFM) into Board papers.

ACTION: The Board Governance Manager to update the Board actions log to reflect the revised delivery date of 17 December 2025 for action 5, para 21 from the April 2025 Board meeting.

Item 7 – Redactions and non-disclosure report

35. The Board **approved** the items identified for redaction and non-disclosure in the September Board pack.

ACTION: The Board Governance Manager to publish the September Board papers in line with the redactions and non-disclosure approved by the Board.

Item 8 – Board effectiveness

36. Alison Sansome and Zoe Grainger were appointed strategy champions for this meeting and provided feedback on which session had worked well strategically and why; which paper had been the most useful strategically and why; and where there was learning and value in doing things differently in the future to occupy a more strategic space. The following points were made:

- The budget and business plan workshop and the case fee session were identified as the most strategically valuable. The opportunity to examine the budgetary implications of increasing levels of demand in a workshop setting, and to explore the insights and thinking on case fees and the alignment with long term strategic direction had been particularly beneficial.
- Whilst all of the papers had been informative and of good quality, the best papers strategically had been those relating to the budget and business planning workshop.
- Board discussions had enabled a strong level of constructive challenge within a safe and inclusive environment and were summarised well by the OLC Chair to ensure there was no ambiguity.
- The meeting agenda had been well structured with sufficient time allocated for each discussion, and the early distribution of Board papers had been particularly welcomed.
- No specific learning had been identified to support the Board in operating at a more strategic level.

Item 9 – Any other business

37. The Board thanked the Chief Ombudsman for his service to LeO and the OLC and wished him well for his new role.