LEGAL OMBUDSMAN

Minutes of the Fourth Meeting of the Public Interests Decisions Committee (PIDCo) of the Office for Legal Complaints (OLC)

27 February 2026

Present

Rachel Cerfontyne, OLC PIDCo Chair (Lay)

Elaine Banton, OLC (Non-Lay)

Elisabeth Davies, OLC Chair (Lay)

Phil Cain, Chief Ombudsman

Steve Pearson, Joint Interim Chief Executive

Louise Arnold, Legal Manager

Tobias Haynes, Lawyer

Sarah Gilbert, Strategic Engagement Manager

Apologies

David Peckham, Joint Interim Chief Executive

Mike Harris, Head of Communications, Engagement, and Impact

Minutes

Kay Kershaw, Board Governance Manager

Item 1 – Welcome, apologies, declarations of interest, and matters arising.

1. The Chair welcomed attendees to the meeting, noting that this was Elaine Banton's first meeting.
2. Apologies were noted.
3. The meeting was quorate with a lay majority.

4. Elaine Banton declared an interest in relation to a law firm connected to a public interest decision under consideration by the Committee. She confirmed that she had no involvement in the case, no connection to the individuals concerned, and no association with the relevant department of the firm.
5. PIDCo discussed the distinction between familiarity with a firm and a substantive conflict of interest, noting the inevitability of such familiarity for non-lay members of the Committee. It was agreed that the declaration should be noted for transparency, but that it did not constitute a conflict requiring further action.
6. There were no other declarations of conflict of interest reported.

Item 2 – Previous minutes and previous actions

7. The minutes of the PIDCo meeting held on 11 November 2025 were approved as an accurate record of the meeting.
8. PIDCO noted the update on previous actions. Two actions had been completed, and one remained open and to be addressed at this meeting.

Item 3 – Feedback on the publication of the quarter three public interest decisions

9. The Committee received an update on the publication of the quarter three Public Interest Decisions (PIDs), noting that the publication had taken place in early February, later than originally anticipated due to resource and workload constraints.
10. Given that it was too early to assess the impact of the quarter three publications, this would continue to be monitored, with an update to be provided at the next meeting in May.

Item 4 – Learning and reflections from the publishing decisions process and the potential criteria for publishing future decisions

11. The Joint Interim Chief Executive presented a paper reviewing the learning from the PIDs published so far and potential considerations for future criteria for publishing PIDs.

12. In discussion, the following points were made:

    - The average website engagement per PID remained broadly consistent across each quarter; however, higher volumes of published PIDs appeared to dilute engagement, with those positioned earlier in the website listing attracting more views than those lower down. More general areas of law tended to attract greater interest than niche or specialist areas.
    - Media coverage following the publication of PIDs had generally been positive, although largely high-level and descriptive rather than analytical.
    - The current PID indicative criteria limited the range of cases available for publication to those where poor service and a detriment had been identified. While the criteria could be amended through policy rather than legislative change, any revisions would require consultation with stakeholders. As PIDs were currently limited to final Ombudsman decisions, early resolution and dismissal outcomes were not eligible for publication; any extension of scope would require legislative change, as dismissals are not classified as determinations under the existing statutory framework.
    - It was noted that publication of PIDs was currently constrained by the limited number of cases available each quarter, restricting both overall volumes and the ability to plan publications around specific themes or areas of law. This variability, alongside potential reductions in case volumes due to improvements in early resolution, raised questions about the sustainability of current publishing commitments made to the Legal Services Board. In this context, the risks of committing to fixed publication targets in the future were highlighted, with a preference for confirming that all suitable cases were considered for publication rather than setting specific numerical targets given the variability in case flow and the risk of perceived underperformance if volumes were to decrease.

- Current systems and processes constrained the effective identification of suitable PIDs. In particular, limited data capability meant that more nuanced or technical service failings could not be readily identified through automated analysis, resulting in a greater reliance on manual case identification and Ombudsman input. It was suggested that, to maximise impact and efficiency, consideration should be given to embedding identification for potential publication earlier within processes and system design, supported by improved data capability.
- It was noted that website engagement metrics alone were insufficient to assess the success of PIDs, and that consideration should be given to developing a broader set of impact measures in the future. These could include indicators such as media coverage, dissemination through key stakeholders including regulators and professional bodies, the extent to which content is reflected in AI search activity, overall audience reach and evidence of learning and behavioural change within the sector. The importance of aligning these measures with regulatory objectives, sector improvement and access to justice outcomes was emphasised.
- It was suggested that consideration was given to enhancing website functionality to improve accessibility and usability, including the introduction of filtering by area of law and complaint type, thematic grouping and tagging, clearer presentation of key insights and learning; content tailored for different audiences, and better distinction between older and more recent published cases. It was noted that while some improvements could be delivered in the short term through enhanced content structuring, more advanced functionality would require longer-term development.
- It was suggested that greater impact could be achieved by proactively distributing PIDs directly to key stakeholders, rather than relying on users to access information via the website, and that there may be value in exploring the feasibility of this approach. It was noted that PIDs were already shared with regulators, professional bodies, consumer organisations and the press, including through requests for onward dissemination via newsletters and communications; however, variability in stakeholder channels and publishing cycles can delay reach and limit immediate impact, and the inability to distribute directly to end users remains a constraint on engagement. It was further noted that any direct engagement should reflect the distinct needs of legal service providers and consumers, with complementary approaches considered.

- It was noted that PIDCo's work aligned with wider regulatory objectives and statutory requirements to promote insight and learning and could therefore be used more proactively to support sector improvement. In this context, there was scope to use insights from published decisions to support wider sector learning, including through joint training initiatives with stakeholders and longer-term engagement with academia to strengthen professional development.
- To build on the progress made by PIDCo in its first year of publishing PIDs, it was noted that further clarity is required on its purpose and strategic role, and that of PIDs, within the wider transparency, insight and impact agenda, broader regulatory objectives, and proposals for transformation of the Legal Ombudsman Scheme. Any decisions to enhance the impact or broaden the scope of PIDs should be taken within this overarching strategic context and within existing legislative constraints.

13. Taking account of the points raised in discussion, PIDCo **agreed** to continue its current approach to PIDs, and that the issues and considerations identified through the discussion would be taken forward as part of the Legal Ombudsman Scheme transformation programme.

Item 5 – Consideration of proposals for Q3 publication

14. The Joint Interim Chief Executive provided an overview of six ombudsman decisions recommended for publication, highlighting the rationale for the recommendations, the associated legal and risk assessments, and the responses received from the parties involved following LeO's notification of its proposal to publish.

15. PIDCo considered each of the six cases recommended for publication to determine whether they met the indicative publishing criteria. After a detailed discussion and careful consideration of the facts and associated risks, PIDCo concluded that five of the six decisions were suitable for publication, with one case subject to further legal review to determine whether publication could appropriately be made against the original firm rather than the successor firm, with the outcome to be confirmed to the Committee outside the meeting.

    ACTION: The Joint Interim Chief Executive and Legal Manager to report back to PIDCo on whether the findings of a further legal review of a potential PID and whether publication could appropriately be made against the original firm rather than the successor firm.

16. PIDCo **approved** the publication of ombudsman's decisions relating to the following firms:

- Heselwood & Grant
- Laytons
- England & Derbyshire
- Keystone
- Allchurch

17. In discussion, it was noted that it would be important to ensure that the publication process remained robust and defensible, particularly in cases where firms had challenged publication, and that appropriate consideration was given to representations received.

Item 6 – Any other business

55. The PIDCo Chair thanked Elisabeth Davies for her contribution and commitment to the Committee and wished her well for the future.

56. There was no other business.