Meeting	OLC Board Meeting	Agenda Item No.	7
		Paper No.	140.5
Date of meeting	24 July 2025	Time required	15 Minutes

Title	Chief Ombudsman Executive Report
Sponsor	Paul McFadden, Chief Ombudsman
Status	OFFICIAL
To be communicated to:	Members and those in attendance

Executive summary

The first quarter of 2025/26 saw LeO continue to deliver high complaint resolution performance - again at the top end of forecast ranges – but also continue to absorb an increasing rate of demand. New complaints received rose sharply, increasing by over 20% year on year in the first quarter, pushing the trajectory of annual demand increases for 2025/26 to 17.5%.

This demand impacts the unallocated investigations queue, which has reduced slightly into range over the quarter but is expected to remain static over the coming quarters. This challenge has informed the Executive's early planning around 2025/26 budget and business planning and recent discussion with the OLC Performance Subgroup around trajectories and potential implications for future years' budget options.

Performance is supported by increased efficiency and productivity, with investigator productivity up 16% year-on-year. This is being further enhanced by LeO's ongoing focus in development and testing of Lean initiatives and digital pilots aimed at key points in the process to reduce administrative burdens and improve efficiency.

Quarter 1 also saw substantial momentum and pace in the delivery of LeO's impact, with several significant strategic initiatives launched as LeO delivers its objective to enhance transparency and drive up standards. This included the first trench of ombudsman decisions published in the public interest, marking a new approach to transparency and highlighting serious failings in legal services. The launch of significant LeO-led initiatives to improve first-tier complaint handling across the sector, alongside targeted work with service providers, will help deliver on our strategic aim to improve complaints handling and reduce or manage demand.

This is supported by analysis and horizon scanning to identify current and future drivers of demand as we look to assess ways of managing emerging demand. The Spotlight insight series - and associated published case studies - continues to provide accessible analysis on complaint trends, with the latest edition focusing on third-party delays.

Whilst this sustained performance and progress against strategic objectives is positive, July's Board risk workshop will highlight an increase in the number of strategic risks and issues outside of tolerance thresholds as LeO manages a number of heightened risks related to increasing demand but also leadership succession, budget approval risks and other areas.

Recommendation / action required

Board is asked to **Note** the report

Equality Diversity and Inclusion

EDI implications	Yes
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The Chief Ombudsman's report provides a summary of activity and performance across all areas of LeO's strategic and operational focus, including in relation to LeO's customers and people and specifically updating on LeO's EDI activity. The report, therefore, covers a wide range of areas with overarching relevance to LeO's EDI focus and the potential for EDI-related impacts. These are considered routinely across business areas as appropriate.

Freedom of Information Act 2000 (Fol)		
Paragraph reference	Fol exemption and summary	
	None	

Performance against LeO's strategic objectives

1. Strategic objective for LeO's service: LeO resolves complaints fairly and effectively, providing an excellent customer experience

Relevant strategic risks and issues

- Strategic Issue 01: Backlog
- Strategic Issue 02: Sector led demand
- Strategic Risk 01 Performance trajectory
- Strategic Risk 06 Overall attrition

LeO's performance - delivering an efficient and proportionate service

LeO continues to deliver high performance, but high demand continues to impact

Quarter 1 resolution performance finished above the top end of forecast ranges, continuing the positive trend from 2024/25. LeO is confident that this performance will continue into Quarter 2 as new investigators from March and May recruitment start to add output. At this point, LeO is on track to resolve up to 8,900 complaints in 2025/26, which would represent somewhere in the region of a 7% year on year increase.

Despite this, sector-led demand continues to impact LeO's ability to reduce unallocated investigations. The number of in-depth investigations awaiting allocation marginally reduced, with unallocated investigations now down to 3,250 customers, within the forecast range. However, with the current rate of demand, we expect unallocated investigations to remain static from Quarter 2 and fall outside of forecast range. In addition to demand, other additional factors are contributing to this: as updated previously 370 additional cases were carried into 2025/26 above trajectory expectations; and investigator headcount is less than planned, with a smaller than expected May recruitment and some investigator leavers due to internal promotions and retirement.

A sustained trend of increasing rate of demand

At July's Performance Subgroup, the Executive highlighted that significant demand increases seen in 2024/25 have increased further so far in 2025/26. New customer complaints increased by over 20% in Quarter 1 when compared to 2024/25, exceeding 3000 new customer complaints. At this rate of increase annual demand for 2025/26 is now forecast to increase by 17.5% to almost 12,500 against a forecast worst case scenario of around 11,000.

These increases are yet to flow through to the investigations process in full as the General Enquiries Team absorb significantly higher volumes of work flowing into LeO.

Recruitment to replace some attrition and create additional capacity is almost complete, with new recruits expected in August.

The increase will flow through as increased core and investigations demand through Quarter 2 and for the remainder of the year.

Delivering further efficiencies

In the face of increasing demand, LeO continues to be an efficient service, with investigator productivity up almost 16% on the same period in the previous year. Lean review initiatives continue to be developed and tested through 2025/26, with indicative results expected toward the end of Quarter 3. This includes a pilot to better use customer wait time prior to allocation by pre-assessing and scoping evidence-ready cases to help shorten overall customer journey time. Early results from the pilot are expected by Quarter 4. Phase three of the Lean process review also commenced in Quarter 1.

Digital solutions are also being built and tested through Quarter 2 and 3 as planned for both investigations and general enquiries.

Discussion at the OLC Performance Subgroup highlighted that further efficiencies are helping LeO absorb increasing levels of sector demand, though are unlikely to provide a whole solution to forecast future rates of demand.

LeO customers' experience

<u>Customer journey time</u>

Average customer wait times in unallocated investigations reduced for the fourth consecutive quarter, sitting at 278 days in Quarter 1, an almost 20% reduction since the same period last year. Overall combined customer journey times increased marginally to 280 days, relatively static in line with a slowing reduction in unallocated investigations and a focus on older investigation.

For early resolution, almost half of the complaints LeO resolves, the average time of closure continued to remain low, finishing the year at less than the 60 days target.

Quality and customer satisfaction

The standard of LeO's casework remains consistently strong across General Enquiries, Early Resolution and Ombudsman decisions both in terms of delivering a high level of service to complainant and service providers alike and the outcomes that LeO delivers.

There remains scope for improvement in service levels in investigations, although Quarter 1 evidenced a significant improvement in the quality of investigation outcomes, an encouraging reflection on work undertaken to address this long-standing area of challenge. This will be closely monitored in the coming quarters as we look to ensure that this increase is an accurate reflection of sustained improvements.

Levels of customer satisfaction remain stable for those customers satisfied with outcome but continues to show fluctuation for those who are dissatisfied with the outcome. This disparity is seen across most Ombudsman schemes but we continue to analyse responses to find ways to improve customer experience regardless of outcome.

Service complaints

The number of new service complaints remained broadly consistent with previous quarters. Whilst focus remains on managing that workload, the attention of the service team is also being used to deliver wider initiatives including the development of the GIAA writing engine project and review of the service complaints process.

The revised service complaints process and a new online service complaints form are due to be launched at the start of Quarter 3, and will improve customer's understanding of what can be considered under a service complaint, help support speedy resolutions and help the team derive enhanced service related insights.

2. Strategic objective for LeO's impact: LeO's independent voice and experience lead to improvements in legal services

Relevant strategic risks and issues

- Strategic Issue 02: Sector led demand
- Strategic Risk 05 Failure to deliver new impact objective

Building LeO's profile and impact

Quarter 1 saw substantial momentum and pace in the delivery of LeO's impact objective, meeting a number of significant strategic commitments and milestones as part of its commitment to transparency and driving up standards. This included making better use of powers to publish ombudsman decisions in the public interest, The launch of key initiatives and engagement on best practice complaints handling and the delivery of the latest edition of the *Spotlight* insight series.

Transparency of LeO's decisions – first published Public Interest Decisions

The first three Public Interest Decisions were published on 9 July following approval for publication by the OLC Board Public Interest Decisions Committee (Pidco). These are the first of our regular planned publication of public interest report decisions as we take a more proactive and transparent approach to its decisions and findings where serious failings have been identified. It marks a renewed commitment to using the powers granted under the Legal Services Act 2007. While resolving individual complaints remains central to its work, publishing decisions in the public

interest will increase the transparency of LeO's work, help drive up standards and accountability, and assist consumers in making better-informed choices.

The first decisions related to litigation, wills and probate and employment law with a range of significant remedies. LeO and the OLC Pidco assessed each complaint to determine on a case-by-case basis whether publication was appropriate. All cases published will involve:

- systemic failures that indicate a substantial number of consumers will be adversely affected; or
- exceptional or severe impact on an individual complainant or group of complainants; or
- very serious service failure; or
- a significant lack of co-operation with the Legal Ombudsman.

Details of these decisions, including the full decisions, have been published on LeO's website, remaining online for 12 months, and shared widely within the sector.

Publication was accompanied by comprehensive communications with stakeholders across the sector, including professional bodies and consumer organisations. Overall coverage has been positive in terms of framing LeO's approach and 'a new era of transparency' and has helpfully reiterated the details of the decisions and reasons for publishing. Coverage included articles in the legal press, blogs written by industry experts on some of the issues outlined in the decisions, and support on social media from those sharing news about this renewed commitment to transparency.

Using LeO's experience to help legal service providers improve their complaints handling

<u>Launch of pilot Model Complaints Handling Procedure (MCRP) for legal sector providers</u>

LeO reached another significant milestone at the end of June, with the launch of a pilot Model Complaints Handling Procedure (MCRP) for the legal sector.

The MCRP has been developed alongside regulators from across the sector and aims to establish and support a clear, consistent standard for first-tier complaint handling for all legal professionals. will provide a standardised template that can be used by any legal service provider in England and Wales. If widely adopted, it will help make complaints resolution more consistent across the profession. It will be supported by detailed guidance materials, template letters and toolkits for service providers.

The MCRP aligns to the positive shift the LSB is aiming to achieve through its revised S112 guidance and first-tier complaints requirements. As a result of positive engagement with regulators as part of the development process, a number of regulators have also included reference to the MCRP in their live first-tier complaint

consultations. We will be responding to each consultation to reinforce the benefits of the MCRP and the collaborative approach being taken.

LeO held its third Regulator Forum meeting in July, bringing together all regulators from across the sector to support collaboration in the development of the MCRP. The meeting provided an opportunity to discuss how regulators are progressing with implementing the LSB's first-tier complaints requirements, including feedback received in response to their consultations, and enabled LeO to update on its MCRP pilot and the project timeline.

LeO has also been engaging with the Legal Services Consumer Panel (LSCP) as part of the Panel's briefing on first-tier complaints handling. The briefing was focused on the required improvements that should be made across the sector and was actively supporting the development of the MCRP and LeO's role in doing so.

Launch of LeO's Tailored Support Programme

LeO launched its new programme of 'Tailored Support' in Quarter 1, a key element in achieving improvement in complaint handling across the sector. This aims to use LeO's insights to work directly with identified service providers to deliver meaningful and sustainable improvements to how they manage and learn from complaints and serve their customers. This includes large generators of complaints or service providers who would benefit most from support. Less formal use of this form of intervention has proven impactful on a limited scale in the past. In formalising and scaling up we aim to ensure strategic focus on providers who might benefit most. This will also make it possible to monitor and track impact.

A number of identified providers have been approached with engagement ongoing to explain the insights identified and the LeO support on offer. Relevant regulators have also been engaged to ensure awareness and ensure support if providers are reluctant to engage with the programme.

It is anticipated that Tailored Support will contribute to a reduction in levels of demand either by increasing the number of complaints that are resolved at first tier or by maximising the potential for complaints that do come to LeO to be resolved through early resolution, thereby reducing demand for investigation. Baseline data for the providers has been captured so that improvements and impact can be accurately tracked and assessed. The level of support required will differ for each provider based on their individual circumstances and therefore the scale of the programme is being managed closely to ensure that it is deliverable, proportionate and sustainable.

Sharing learning and insights to inform legal services and prevent complaints <u>Spotlight insight series</u> LeO published the second edition of its new *Spotlight* insight series – which aims to deliver accessible insight into the issues LeO sees within 'hot topic' areas of complaints.

The second edition focused on delays caused by third parties, and received widely positive stakeholder feedback. LeO will continue to seek to extend the reach and traction of these articles – each of which is also accompanied by new published case studies, helping LeO meets its transparency commitments.

We also continue to develop the pipeline of future editions. The next two are likely to focus on the range of remedies LeO can award, and early resolution.

2024/25 Annual Report and Accounts & annual complaints report

The 2024/25 Annual Report and Accounts was laid in Parliament on 8 July and subsequently published on LeO's website. A copy of the report and the key messages surrounding LeO's achievements in 2025/26 were shared with stakeholders across the sector.

LeO's 2024/25 annual complaints report will be published in Quarter 2, providing an overview of LeO complaints received and resolved, what we have seen in different areas of law, and where poor service or complaints handling has been identified.

The annual complaints report will be accompanied by a selection of around 20 new case studies published alongside the insight report – again increasing transparency, accountability and learning and a significant resource offered to legal service providers.

Assessing increasing demand, including horizon scanning and mass and high-volume claims

In the face of further increasing demand, a summary analysis of new customer complaints has been undertaken to assess any early indicators of areas of law particularly driving demand. Emerging analysis has shown that complaints continue to rise generally across areas of law but that complaints volumes rising in high-volume complaint areas - such as conveyancing, wills and probate and personal injury – is a driver of the longer term trend. It also shows that consumers continue to be let down by high levels of poor service and poor first-tier complaints handling.

Horizon scanning is also highlighting a number of potential high-volume or mass claim areas within the legal sector which could drive further increases in future demand. This includes complaints about legal services provided in areas such as motor finance related discretionary commission claims, housing disrepair claims, and cold-calling practices across the sector. Given the scale of potential claims, it is expected that LeO will see an increase in demand as a result of how providers deal with claims. Across the quarter, LeO has been engaging with the SRA and FOS to consider the potential impact and management of potential complaints in these areas. We will be continuing to engage with stakeholders to help inform LeO's monitoring and response to any significant demand challenges.

This horizon scanning, the long-term trend on sector demand and experience of the SRA and Ombudsman schemes in other sectors all inform the view that long term trend increases will continue into 2026/27 and beyond which informed discussions at July's meeting of OLC Board PSG on future trajectory and budget setting.

Sector engagement and improvement through our learning and insight work continues to be critical. Progressing at pace on areas where LeO can have a direct impact is ever more important - including at individual firm level through tailored support and at a broader sector level through model complaints handling initiatives and increasing the data, insight and decisions we publish.

LeO's insight lifecycle

At the February OLC Board workshop, we presented plans to develop our insight capability around the concept of an 'insight lifecycle'. This has continued to guide our work, including in building the analytical systems and processes that sit behind the more visible learning and insight outputs.

This work includes:

- Developing a new Business Intelligence report to analyse enquiry data, allowing us to monitor early indications of demand more effectively.
- Using our Technical Advice Desk tracker to analyse themes suggest topics for potential social media posts.
- Building new learning and insight dashboards to support our annual and quarterly complaints data publications.
- Working with the operations team to continue to enhance our data quality, including better monitoring of incomplete data records.
- Strengthening internal channels to surface insight, including a mechanism to enable casework colleagues to identify potential case studies and complaints that might be considered for Public Interest Decision publication.
- Preparing our analysis approach to support future evaluation of the MCRP pilot and our Tailored Support initiative.

LSB's ethical standards consultation

In May LeO responded to the LSB's consultation on its new regulatory proposals to strengthen lawyers' ethical standards. The response was supportive of the LSB's introduction of a policy and supportive of the active steps being taken to address unethical practices in the legal sector.

The response was focused on emphasising that complaints handling should be considered within LSB's framework as a core aspect of upholding and demonstrating professional ethical duties. The response also highlighted that complaints, when they emerge, can be a critical and sometimes early indicator of whether these ethical duties are being prioritised properly.

3. Updates on strategic enablers and supporting strategies

3.1 People and culture

Relevant strategic risks and issues	Strategic Risk 02 – Leadership resilience	
Trelevant strategic risks and issues	 Strategic Risk 06 – Overall attrition 	
Strategic relevant to update	People Strategy and EDI Strategy	

People performance

Staff turnover has demonstrated a continued stable pattern into 2025/26, aside from generally expected variations from month to month. The rate at which colleagues are leaving remains comfortably within acceptable targets and, notably, the number of investigators choosing to move on has declined compared to the previous period. While there was a slight uptick overall, the turnover figures continue to sit firmly within our preferred range.

Sickness absence has continued its downward trajectory, reducing consistently over the last year from a peak of 15.9 days per employee at the end of Quarter 2 2024/25 to 13.8 days this last quarter. Though this figure remains outside the targeted 11 days, this has been a key focus for LeO's Executive Team, with plans for further interventions to improve attendance being planned. Mental Health remained the main reason for sickness absence in Quarter 1, although the number of days lost has fallen compared to the end of Quarter 4. Currently there are six employees on long term sick leave, four of which are absent due to mental health issues compared to three at the end of Quarter 4.

Following a review of recurrent long-term sickness absence cases, we have seen a 13% reduction in overall sickness absence over the past year. While the overall absence rate remains high, this impact justifies a repeat exercise in 2025/26. In parallel, HR Business Partners continue to work closely with managers to enable timely and consistent intervention in absence management. A range of HR and equality initiatives are also in place to support employee wellbeing and attendance.

Delivery of the People Strategy

The ongoing Leadership Development Programme continues to equip LeO's managers with the knowledge and skills needed to address people-related matters consistently and fairly. In addition, a new Aspiring Leaders Programme was successfully launched, attracting strong interest and positive feedback from participants. The initial uptake exceeded expectations, reflecting a clear appetite for further development opportunities.

Other key priorities include the ongoing embedding and further development of LeO's Attraction and Retention Strategy, further review and enhancement of LeO's

Employee Value Proposition (EVP) to support LeO's ambition to become an employer of choice, digital transformation and Al Strategy and succession planning/talent management.

Engagement with LeO's people

Staff Council

Discussions with Staff Council covered a range of areas, including leadership transition, budget and business planning and LeO's strategic direction over the next 12 months, including LeO's focus on impact, and the Cabinet Office pay remit guidance and how this will be implemented to support those at the lower end of the pay scale.

Key questions or issues raised by LeO's people were also covered, including benchmarking, overseas based employment, sickness absence monitoring, and the refreshed Celebrating Success scheme.

Civil Service People Survey

A detailed analysis of the 2024 Civil Service People Survey was completed and shared with RemCo members at their March meeting. The findings have since been cascaded to colleagues across the organisation.

As with last year, 'safe space' meetings were held with staff networks to explore the experiences of colleagues with protected characteristics and caring responsibilities. In addition, manager-led sessions are currently underway with individual teams to gather further feedback and insights. These will be shared through this forum in due course.

The survey findings will inform the 2025/26 People Strategy deliverables and shape the ED&I Strategy and action planning, where applicable.

Equality, Diversity and Inclusion (EDI)

LeO saw encouraging results from the 2025 Social Mobility Survey, which confirms LeO as a socially diverse and inclusive organisation. The data shows that individuals from low socio-economic backgrounds can and do progress into senior roles at LeO with a significant proportion of senior leaders, line managers, and ombudsmen coming from lower socio-economic backgrounds. LeO has outperformed national benchmarks set by the Social Mobility Commission and also compares favourably to legal sector data published by the Solicitors Regulation Authority. Social mobility is a strength at LeO, and our organisational culture continues to support diverse talent at all levels.

LeO launched its EDI impact and success performance framework, providing a structured way to measure progress against our Equality Priority Objectives and broader EDI goals. Early results are promising, showing strong performance in key areas such as inclusive culture, leadership commitment, and accessibility of service.

In Quarter 1 LeO marked Pride Month with a series of network-led activities. Our LGBTQ+ network was highly active, taking part in Birmingham and Cymru Pride events, and hosting a Pride-themed bake-off. These activities help to foster visibility, inclusion, and allyship within the organisation.

Externally, we strengthened our presence in the wider EDI space by attending a rage of networking events, including the Business Disability Forum's (BDF) Annual Conference. The BDF event provided valuable insight into inclusive leadership and the future of workplace accessibility, enabling us to bring best practice thinking back into LeO's own inclusion strategy.

Our Women's Network published a well-received blog on 'empty nest syndrome', encouraging open conversations about life transitions and wellbeing.

3.2 Relationships and collaboration

Strategies relevant to update	N/A
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Throughout Quarter 1, LeO has continued to build momentum in its engagement and collaboration with key stakeholders across a range of areas.

Engagement with regulators has continued with increased regular information sharing and engagement on strategic and operational issues, particularly around sector complaints handling and collaboration on areas of potential mass claims. Collaboration with the regulators has been a central feature of the development of complaints handling best practice, and the shared wider commitment to improve first-tier complaint handling across the sector.

This quarter LeO attended a local law society event providing an opportunity to speak directly with the profession on LeO's role, its priorities for 2025/26 and the support and insight it can provide around improving services and resolving complaints.

3.3 Systems and intelligence

Strategies relevant to update	Digital transformation strategy (in development)
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Digital and Al progress is advancing and underpinning of LeO's plans for improvement. LeO continues to develop and build Al solutions aimed at reducing administrative burdens throughout our process. This includes an Al system designed to eliminate duplication and minimise manual processing through the evidence gathering stage of LeO's process; and digital solutions now planned at the front end of LeO's process to support General Enquiries Team with significant increases in demand.

Our work with GIAA continues to deliver generative AI solutions. An AI drafting engine with significant future potential for LeO's efficiency, has now been built for LeO's internal service complaints function, with initial user acceptance testing completed.

These solutions will progress to live testing and feedback in July.

To advance AI integration, LeO has procured Co-Pilot licenses and distributed them across a wide section of the organisation. This approach encourages staff to use Co-Pilot in their daily activities, aiming for self-generated efficiencies and systematic reporting of successes and challenges to IT. The intention is to foster iterative improvements and identify future opportunities for digital transformation ahead of a potential broader rollout.

The ICT team maintained a strong emphasis on cyber security through a series of focused sessions. These sessions covered technical controls, business continuity planning, the GovAssure framework, and assessment of the governments "Digital By Design" framework, ensuring that practices aligned with national standards to mitigate against an ever-present risk. To further enhance cyber resilience, Executive Team completed one of a series of IT planned desktop exercises. Using a real-life scenario, this session tested incident response procedures and highlighting areas for enhancement, which are currently being developed.

3.4 Value for Money, resources and governance

Relevant strategic risks and issues

- Strategic Risk 03 Budget variance
- Strategic Risk 04 Accommodation risk

The forecast year end budget variance as of the end of Quarter 1 is an underspend of £16,365 which, at -0.08 %, is within the tolerance level. The budget monitoring process for 2025-26 has commenced, with early departmental financial review meetings held in June. These meetings continue monthly throughout the year to ensure timely monitoring of budget and implementation of mitigating actions to remain within the tolerance level.

Unit cost should have increased in the first quarter compared to the end of 2024-25 as a result of a 3.25% increase in staff costs in line with the Cabinet Office 2025-26 pay remit guidance. However, there is a decrease in the cost per early resolution outcome due to the required time to receive ministerial approval for and implement LeO's staff pay award in implementing vacant posts. The increase in the cost per investigation outcome was exacerbated by a 2.7% decrease in investigated closures compared to quarter 4 of 2024-25.

In terms of strategic risks and issues, LeO had two issues and four risks outside tolerance thresholds as a result of:

- increased risk scoring on demand as demand rates increase;
- leadership resilience risk now out of tolerance as a result of delays in approval for interim Chief Ombudsman recruitment;
- budget variance risk now out of tolerance as a result of uncertainty over ministerial scrutiny and approval of the 2025/26 levy allocation for LeO's budget; and
- backlog and performance issues now outside of tolerance due to a shift in the risk appetite position from "eager" to "open," aligning with the current demand challenges and the proposed risk appetite statement.

Additionally, two risk descriptions have been revised: attrition risks have been consolidated into one overarching risk; and the hub risk has been updated due to cancellation of the GPA Birmingham hub failing to secure cabinet office funding.

Comprehensive updates on all risks, including appetites and tolerances, will be discussed at the OLC Board July risk workshop.

The 2025/26 GIAA audit plan remains on track, with the IT operational delivery audit nearing conclusion. At the end of quarter one, we have a total of nine recommendations open – which has decreased by two since the last reporting period.