

This paper will be published

SRA Corporate Complaints November 2023 – October 2024

Reason for paper	This paper updates the Board on corporate complaints for the year 2023/24 including the Independent Reviewer of Complaints (IR)'s annual report.
Recommendations	The Board is asked to consider: a) the IR's annual report 2023/24 (annex 1) b) the confidential item (annex 2) and c) the key trends in complaints in 2023/24 and the areas of focus to improve our service.
Previous Board and committee consideration	We provide a report to the Board every year about the corporate complaints we receive and the IR's annual report. The last report came to the Board in July 2024.
Next steps	We continue to carefully consider the corporate complaints we receive, and to implement learning we identify to improve our service to customers.

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SRA Corporate Complaints November 2023 – October 2024**Summary**

- 1 This paper reports on corporate complaints for the year 2023/24 including the report of our Independent Reviewer of Complaints (IR). It considers key trends seen throughout the period and areas of focus for our teams to improve our service to customers.

Background

- 2 We have a comprehensive three-stage procedure for handling complaints made about our service. We are often able to resolve issues that arise quickly and informally when raised with us. Where this is not possible, Stage 1 complaints are dealt with by staff in the operational area in which the complaint arose. If the complainant remains dissatisfied, the concerns are escalated to Stage 2 and are dealt with by our central Corporate Complaints Team (CCT). This provides a fresh perspective on a complaint because our CCT is not attached to any operational department. Our complaints process is flexible and, in some circumstances, our CCT will proactively step in early and work with operational units to help ensure things get back on track quickly.
- 3 If a complainant remains unhappy, they can ask for an independent review at Stage 3. The Centre for Effective Dispute Resolution (CEDR) was appointed as our IR in 2018 and re-appointed again in 2024 following a competitive tendering process. The IR also undertakes bi-annual audits of our complaints handling function.
- 4 We would like to thank the IR for its annual report. It provides valuable feedback to us throughout the year which helps us to improve and develop our services. We value the work it does for our complainants in reviewing individual concerns, auditing our complaints work, and for its annual reports.
- 5 Our complaints process provides us with both insight into areas where we need to do more, and an invaluable opportunity to address areas of concern with people directly. How we respond individually really matters to us. We know from the feedback we receive that even when we are not able to give somebody what they have asked for, complainants value being heard and the opportunity to raise concerns although complainants may still remain dissatisfied with a regulatory decision the organisation has made.

Discussion**Number of corporate complaints November 2023-October 2024**

- 6 We responded to 1,069 complaints about our service (802 Stage 1 complaints and 267 Stage 2 complaints). The IR considered 94 complaints at Stage 3. The numbers of Stage 1 and Stage 2 complaints are broadly in line with last year- having increased by only 2% from 2022/23.

Year	Stages 1 and 2	Stage 3
Nov 2019 - Oct 2020	927	105
Nov 2020 - Oct 2021	972	74
Nov 2021 - Oct 2022	808	77
Nov 2022 - Oct 2023	1044	83
Nov 2023 - Oct 2024	1069	94

- 7 The table below is a breakdown of complaint volumes at Stages 1 and 2, broken down by the top three business areas. Further detail on the potential root cause of some of the increases/decreases in complaints by business area can be found in paragraphs 11-32.

Year	Investigations	Client Protection	Contact Centre
Nov 19 - Oct 20	672	69	139
Nov 20 - Oct 21	545	172	175
Nov 21 - Oct 22	567	115	68
Nov 22 - Oct 23	636	186	119
Nov 23 - Oct 24	650	258	77

- 8 The table below shows the top three categories of complaint across the business (*a complaint can have several categories). The previous year’s figures are in brackets for comparison.

Year	Dissatisfaction with Outcome	Delay	Dissatisfaction with Process
Nov 2023 – Oct 2024	618 (604)	214 (234)	185 (247)

- 9 Dissatisfaction with the outcome continued to be the main type of complaint. Delay was the second category of complaint, although overall there were fewer complaints in this area than the previous year. Dissatisfaction with our process was the third category of complaint, but complaints of this nature dropped significantly from the previous year. This year and last year complaints about unclear communication (including concerns about not keeping people updated, not replying to correspondence, and not explaining matters clearly) were not in the top three types of complaint. However, these types of complaint increased from the previous year and at 183 were just behind the third category of complaint.
- 10 During 2023/24, 95% of Stage 1 complaints were dealt with within our published service levels and 99% of complaints were responded to within our published service levels at Stage 2.

Key Themes

Investigations team complaints in line with last year’s figures

- 11 Complaints about our investigation work slightly increased by 2.2% compared to last year. Of the 650 complaints about our investigation work, 564 (86.7%) related to our initial assessment decision not to investigate issues reported to us.
- 12 In 22/23, we reported that the assessment team made significant progress reducing its waiting times for customers and reducing its work in progress and this progress was sustained in 23/24. The assessment team completed 2.5% more matters during the year than the previous year. The 2% rise in complaints is therefore broadly proportionate to the additional work completed.

Assessment cases dealt with 2019-24

	2019/20	2020/21	2021/22	2022/23	2023/24
Total concerns received	9,642	10,358	10,121	10,963	11,852
Total concerns assessed	9,375	9,329	9,972	11,137	11,421

- 13 We also know from our work, and the IR's report, that decisions not to take regulatory action when a report is made is a key area of dissatisfaction for complainants. Further, it is the area where complainants are most likely to go through all three stages of our complaints process because, as a regulator, we cannot simply resolve these complaints by providing complainants with the resolution they personally want. It is therefore not unexpected that we should receive a higher number of service complaints in this area given the growth of assessment decisions in the year.

Improvement work in the Investigation teams

- 14 Many reports made about solicitors fall outside our remit. This issue has been highlighted in successive IR reports. Recognising we need to do more to assist complainants to understand the types of concerns we investigate, we reported last year that we updated our "Report a Solicitor" webpages in November 2023 and supplemented this with case studies in May 2024.
- 15 Building on this work to assist the public understand our role, in November 2024 we also added four avatar videos to our website:
- "How to complain",
 - "What we can do when things go wrong",
 - "What we can investigate" and
 - "What we can't investigate".

Following introduction of the videos, we monitored feedback from our website pages. From 5 Nov 2024 to 22 Apr, 92% of users who expressed a view (774 of 842) said the page "Reporting a solicitor or firm to us" was useful rather than not useful. The four videos collectively were viewed 884 times during the

period. The most viewed video was “How to complain” with 335 views. The least watched video was “What we can’t investigate” (154 views). During the period the videos also received nine “thumbs ups” and no “thumbs downs”.

- 16 In 2023, our investigation teams went live with several process changes delivered through our Continuous Improvement Project. These changes aimed to improve customer experience by improving the timeliness and quality of our investigations. We introduced changes to our case management system, including an automated prompt to remind Investigation Officers to update customers at the outset of our investigations and a dashboard for Investigation Officers, enabling greater visibility of when ongoing customer updates are due.
- 17 In addition, a new suite of management reporting was introduced. The data provides greater visibility of cases where we may have missed an update. This gives us more opportunity to proactively rectify the issue by contacting the customer to apologise and update them before a complaint is made. Additionally, our QA team will be doing a deep dive into customer updates this year to see if there are further improvements we can make.
- 18 These improvements have contributed to a continued downward trend in the number of upheld complaints of delay in our investigation team. In 21/22 there were 56 justified delay complaints, this reduced to 44 22/23 and reduced again to 35 in 23/24.
- 19 Recognising the need to improve the clarity and quality of our communication with customers the team has also implemented further process changes. In October 2024, the team introduced a new process for communicating decisions with complaints about our decision not to investigate (in AERT) or to take no further action (in the investigation teams). The team developed a templated document which drives the Investigation Officer to set out the issues reported to us, the steps we have taken to investigate, and clear reasons for our decision not to investigate.

Increase in Client Protection complaints

- 20 Complaints about our Client Protection work increased from 186 (Stage 1 and Stage 2) complaints in 2022/3 to 258 in 23/24 representing an increase of 38%.
- 21 Of the 258 Client Protection complaints, two areas of work stood out: Complaints about Intervention Archives and complaints about Compensation Fund applications.

Intervention Archives

- 22 There were 174 complaints about Interventions Archives (compared to 110 last year). The number of complaints is a reflection of the substantially increased volumes of work in this area. Intervention levels were lower than the previous year (59 versus 65) but this remains high compared to 25 and 26 interventions in the preceding two years.

- 23 The team continues to deal with the consequences of several substantial interventions which significantly increased the number of consumers impacted. To give context of the increased workload, during 2023/24 the team collected over 193,000 boxes (compared to 103,000 in 2022/23) and returned over 33,000 documents (an increase of 96% compared to 2022/23).
- 24 Complainants were predominantly individuals who were looking for documents, usually a Will, Trust Deed or other property documents. The complaints generally arose because we had yet to locate the documents concerned.
- 25 The Client Protection team has substantially increased the level of resources employed to conduct this work but is also restricted by the capacity of third-party storage companies to release files to the team.

Compensation Fund complaints

- 26 There were 58 Stage 1 and 2 complaints about Compensation Fund applications (41 last year). This increase also reflects an increase in the team's work. The volume of Compensation Fund claims increased by circa 9% in 2023/24 compared to the previous year.

Improvement work in the Client Protection teams

- 27 The team monitors complaints received and puts considerable effort into addressing service complaints. This is demonstrated by a low level of complaint escalation to the next stage. Out of the 234 complaints made at Stage 1 only 24 progressed to Stage 2.
- 28 The team is currently working on an improved application process for files to be returned and are exploring a move to online client identification to help reduce delay and expedite the returning of documents.
- 29 The team is also providing further training to staff to improve the quality and timeliness of their communication and their ability to deal with queries and concerns about their work.

Decrease in Contact Centre complaints

- 30 The volume of Contact Centre complaints has reduced significantly from 119 in 2022/23 to 77 in 2023/24.
- 31 The positive reduction of service complaints by over a third can be attributed to a positive Keeping of the Roll exercise (KoR) and Practising Certificate Renewal Exercise (PCRE) experience for customers. In 2022/23, we received a higher-than-normal volume of complaints during the KoR exercise. Customers are now familiar with this process and Multi-Factor Authentication (MFA), which in turn has reduced dissatisfaction levels.
- 32 The Contact Centre continue to have a large focus on customer experience as evidenced by its re-accreditation with the Institute of Customer Service (ICS) in

February 2025. Each month the team review customer insights, including complaints and voice of customer data, to identify root cause and implement improvements to improve the Contact Centre.

Accessibility and fairness

- 33 We received 31 Stage 1 complaints about bias and 21 Stage 2 complaints (4.8% of total Stage 1 and Stage 2 complaints). We did not uphold any complaints in this category.
- 34 We considered 53 complaints of discrimination in the year (4.9% of total Stage 1 and 2 complaints). Across Stages 1 and 2 we considered 3 age, 16 disability, 4 gender reassignment, 25 race, 4 sex and 1 sexual orientation discrimination complaints.
- 35 We found no evidence of discrimination, but we partially upheld 2 complaints (the same complaint both at Stage 1, and Stage 2) on the basis that we made an error in our process. Specifically, we did not fully record the complainant's preferred pronouns and therefore unfortunately we inadvertently misgendered the complainant. We apologised to the complainant for our mistake. Otherwise, neither we nor the IR upheld any other discrimination concerns.
- 36 We recognise through our complaints work and the IR's work that there is still more to do in terms of awareness and implementation of our Reasonable Adjustment process across teams. To address this, we are currently undertaking a review to assess how well the Reasonable Adjustments process is being embedded in practice and to identify areas of improvement. As part of the review we shall also reinforce the importance of clearly communicating Reasonable Adjustment decisions, both when adjustments are granted or declined. These actions aim to ensure a more consistent compliant and customer-focussed approach to Reasonable Adjustments across the organisation.

Recommendations: the Board is asked to consider:

- a) **the Independent Reviewer's annual report 2023/24 (annex 1)**
- b) **the confidential item (annex 2) and**
- c) **the key trends in complaints in 2023/24 and the areas of focus to improve our service.**

Supporting information

Links to the Corporate Strategy and/or Business Plan and impact on strategic and mid-tier risks

- 37 Our corporate complaints process supports strategic priority four: We will be an authoritative and inclusive organisation, meeting the needs of the public, consumers, those we regulate and our staff.

How the issues support the regulatory objectives and best regulatory practice

- 38 The issues discussed in this paper support the regulatory objective to protect and promote the public interest and the principles of better regulation specifically transparency, accountability, and proportionality.

Public/Consumer impact

- 39 Our corporate complaints reporting at all stages helps us to better understand the experience of the public and businesses that use our services and learn where we can make improvements.

What engagement approach has been used to inform the work and what further communication and engagement is needed?

- 40 The IR's Annual Reports are published each year by us and the IR and we use its feedback to improve our service.

What equality and diversity considerations relate to this issue?

- 41 This paper covers complaints about bias and discrimination within our services, setting out what we are doing to address any issues.

How the work will be evaluated

- 42 Areas to focus on to improve our service are considered in this annual report to the Board.

Annexes

Annex 1 **The IR's annual report 2023/24**

Annex 2 **Confidential Item**

NB: annex 2 of this paper will not be published because: it includes discussion of risk that might be exacerbated by publication.