Mr Chris Bury

26 November 2025

Dear Mr Bury

Complaint against the Solicitors Regulation Authority (SRA2004926)

I am writing to you with reference to your application for independent review of the SRA's handling of your service complaint about its approach to your report of concerns about Mr Sean O'Connor and Ms Claire Porter ("the Solicitors").

Remit of review

As Independent Complaints Reviewer, my remit is only to consider the quality of service provided by the SRA's complaints handling team. This independent review is not an appeal process, and I cannot challenge or overturn the SRA's decisions or amend its set policies. This process is not an alternative to litigation, and it is beyond the scope of this review to investigate any substantive disputes of a legal nature. However, I am able to look into:

- whether the SRA's investigation of a complaint has been thorough and fair;
- whether all relevant facts were taken into account;
- whether the conclusions reached were reasonable and properly explained; and
- whether the investigation was handled efficiently and without unnecessary delay.

In addition to the above, it may be helpful for me to explain that this review is independent from the SRA, and, as such, I do not have direct access to any of its systems or documentation. I am only able to base my findings on the evidence available to me at the time of review. It is

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not within the remit of my role to search for and obtain additional evidence in order to substantiate complaints against the SRA.

Review of complaint

Your complaint to the SRA stemmed from your report of concerns about the Solicitors who are employed by Herefordshire County Council Legal Services Department. You believe the Solicitors breached the SRA's Principles and Code of Conduct, which undermined your ability to seek redress before the Investigatory Powers Tribunal. You expressed dissatisfaction with the SRA because its investigations into your report about the Solicitors failed to result in a decision to pursue regulatory action against them.

The SRA's Investigation Officer sent his decision in this respect to you on 31 July 2025.

I note that the SRA engaged with you and provided a written response regarding your complaint on 5 September 2025.

- At the outset of this response, the Complaints Officer set out her role and remit, including an explanation that she could not reassess your report.
- She set out the background to your report.
- She said that she was satisfied that the outcome of the Investigation Officer's consideration of your report was reasonable.
- She provided comments on the SRA's Assessment Threshold Test.
- The Complaints Officer was satisfied that the Investigation Officer had considered your concerns against the SRA's criteria and found that the information you provided did not show that there were any breaches of the SRA's standards that it needed to investigate. She explained that it was for the SRA to decide whether or not to take regulatory action against firms or individuals reported to it.
- The Complaints Officer confirmed that it was for the Investigation Officer to decide whether additional information was required, which, in this case, they had found was not necessary.
- She outlined your alternative option of bringing your concerns about data breaches or subject access requests to the Information Commissioner's Office ("ICO").

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- The Complaints Officer was satisfied that the Investigation Officer had followed the SRA's processes and procedures, and there had been no shortfalls of service to you.
- She signposted you to Stage 2 of the complaint procedure if you felt that your complaint had not adequately been addressed.

You escalated your complaint, and I note that the SRA provided its final response to you on 2 October 2025.

- The Corporate Complaints Officer set out his role and remit, including an explanation that he could not reassess your report.
- He set out the background to your report, and its assessment by the Investigation Officer.
- He explained that the SRA does not claim to fully explain its thinking or to demonstrate how it forms a particular view. Its obligation is only to provide a clear and definitive decision. He was satisfied that the SRA had met that standard.
- The Corporate Complaints Officer acknowledged your concerns, but said that, ultimately, your complaint related to your dissatisfaction with the SRA's assessment and outcome. He reiterated that his review was not to investigate; rather his role was to consider whether the steps the Investigation Officer took were appropriate to determine whether the SRA needs to act further, and to consider whether the assessment and decision were fair. On those points, he was satisfied that the Investigation Officer acted appropriately and made a reasonable assessment in light of the SRA's Standards and Regulations and its Enforcement Strategy.
- The Corporate Complaints Officer provided comments on the role of the SRA. The SRA, as a professional regulator, does not act to bring about an outcome for individuals but rather in service of the public and the profession's wider interests. He noted that it was for the SRA to decide whether there was a risk to the public or the integrity of the legal profession.
- He was satisfied that the Complaints Officer had explained the actions and decision taken by the Investigation Officer. He did not believe that she had misunderstood your concerns, and he felt that her reference to the ICO was reasonable.
- The Corporate Complaints Officer said that he was satisfied that the SRA's handling of your report was reasonable.

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- He confirmed that he had not found any failings on the part of the SRA, and, therefore, he would not conduct a review under part 3.2 of the SRA's rules.
- He signposted you to Independent Review if you remained unhappy with the SRA's responses to your complaint.

In your application for independent review of the handling of your complaint, you have stated that the complaints team mischaracterised your complaint. You have said that the SRA failed to explain its reasoning. You have said that the complaints team did not address your request for the SRA to exercise its powers under rule 3.2. You have said that the Complaints Officer improperly deferred to the ICO. You have said that the complaints team did not exercise independent scrutiny of your concerns.

Conclusion

As I have already indicated above, this is not an appeal process, and I cannot overturn the SRA's regulatory decision not to take any further action in relation to your concerns about the Solicitors, nor can I amend the SRA's set policies and processes.

Following careful review of the SRA's overall responses, I find that it has appropriately replied to your concerns and explained the reasons for its position.

I find the responses delivered by the SRA's complaints team to your complaint to have been clear and reasonable. I do not agree that the complaints team mischaracterised your complaint. I do not agree that the SRA failed to explain its reasoning. I do not agree that the complaints team did not address your request for the SRA to exercise its powers under rule 3.2; the Corporate Complaints Officer explained that this was not appropriate given that he had found no failings on the part of the SRA. I do not agree that the complaints team did not exercise independent scrutiny of your concerns; I note that they explained that their remit does not extend to reinvestigating the case. I do not agree that the Complaints Officer improperly deferred to the ICO. I would support the SRA's suggestion that the ICO is the correct agency to consider any concerns about data breaches or subject access requests.

Based on the evidence available, I am satisfied that the SRA's investigation of your complaint has been thorough and fair, that all relevant facts have been taken into account, that the conclusions reached in respect of your complaints about the service provided by the SRA have

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been reasonable and appropriately explained, and that the investigation of your complaint was handled efficiently and without significant delay.

In summary, whilst I appreciate your clear frustration with the SRA's decision about your report regarding the Solicitors, I am unable impartially to conclude that there are any material failures falling within the remit of this independent review regarding the SRA's handling of your complaint.

This marks the end of my examination into this matter and this independent review is now closed.

Yours sincerely

Tamsin Gill, MA (Hons), Solicitor (non-practising)

Independent Complaints Reviewer

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