To: complaintsreview@cedr.com
Subject: Referral to Independent Reviewer – Service Complaint RGC-000[redacted] (linked to RGC-000[redacted])

Dear Independent Reviewer,

I am referring my service complaint against the Solicitors Regulation Authority (SRA) for your review. This concerns the SRA's handling of complaint reference RGC-0001[redacted], which relates to the earlier regulatory closure decision RGC-0001[redacted].

For clarity, this is not an appeal of the regulatory decision itself. My complaint is about the **failings in the SRA's complaints process at** Stage 1 and Stage 2, which I believe were neither thorough nor fair and fell below the standards required by the SRA's Complaints Policy.

Grounds for Referral

1. Mischaracterisation of complaint
   Both Stage 1 and Stage 2 repeatedly treated my complaint as disagreement with the outcome of the regulatory decision. In fact, my complaint was about procedural flaws and service failings: failure to apply the Assessment Threshold Test correctly, failure to engage with obtainable evidence, and failure to address my request under Rule 3.2 ANRAR.

2. Failure to explain reasoning
   In its Stage 2 response (2 October 2025), the SRA admitted: *"the IO has not demonstrated to you how your information does not show a breach of our rules"*.
   Yet the response still concluded that the handling was "reasonable." This directly contradicts the Complaints Policy standard that decisions must be explained and reasonable.

3. Failure to address Rule 3.2 request
   Neither Stage 1 nor Stage 2 engaged with my explicit request that the SRA consider exercising its powers under Rule 3.2 ANRAR to review/correct the closure decision where a material procedural error was identified. No reasons were given for declining this.

4. Improper deferral to ICO
   Stage 1 suggested I raise the matter with the ICO and implied the SRA would only reconsider if the ICO were critical. This amounted to outsourcing the SRA's own public interest duty, contrary to its Enforcement Strategy. Stage 2 ignored this point entirely.

5. Circular reliance on the original IO
   Both Stage 1 and Stage 2 endorsed the Investigation Officer's

decision without independent scrutiny of whether his refusal to seek available evidence was itself a service failing (lack of care). This undermines the Complaints Policy requirement for a thorough and independent review.

Policy Standards Breached

Taken together, the Stage 1 and Stage 2 responses failed to meet the SRA's Complaints Policy tests:

- Whether the correct procedure was followed.
- Whether all relevant information was considered (and no irrelevant information relied upon).
- Whether the decision was reasonable.
- Whether the complaint was handled efficiently and fairly.

Remedy Sought

I respectfully ask the Independent Reviewer to find that the SRA's handling of my complaint fell below the expected standard, and to recommend that:

- The SRA acknowledge the service failings identified.
- The SRA issue an apology for the inadequate handling of my complaint.
- The SRA review its procedures to ensure that future complaints about procedural flaws (rather than outcome disagreements) are thoroughly and fairly assessed.
- The SRA confirm that the relevant case file is preserved until all complaint processes, including this review, are concluded.

Attachments

For ease of reference, I enclose the following documents:

1. SRA Stage 2 response – *S2 Mr Bury.pdf* (2 October 2025)
2. SRA Stage 1 response – *Mr C Bury Response – RGC-000[redacted].pdf* (5 September 2025)
3. My Stage 1 complaint – *SRA Stage 1 Service Complaint – RGC-000[redacted] (Porter-O'Connor).pdf*
4. Underlying closure decision – *SRA RGC-000[redacted] – Closure Letter.pdf*

I would be grateful for your confirmation of safe receipt of this referral.

Sincerely

Mr Chris Bury