Our ref: RGC 000[redacted]

Private & Confidential
FAO Mr Bury

By Email only: chris[redacted]

2 October 2025

Solicitors Regulation Authority

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Dear Mr Bury

Your complaint about the Solicitors Regulation Authority (SRA)

Thank you for telling us about your remaining concerns. I have now completed a review of our service to you. This was at stage two of our complaints process.

I have read your complaint and reviewed how we have answered your concerns. I can recommend further activity where I can see that our actions have not been sufficient, or where we have not given you a good service.

By its nature, my review was retrospective. I looked at the decisions we have made, to check that they were based on an appropriate assessment of the information that we have seen. However, I have not undertaken new enquiries, and I cannot act as an appeal of our outcome. My remit and focus was about our service to you.

Your report about Mr O'Connor and Ms Porter

In summary, you have been in dispute with Herefordshire County Council for a number of years. Mr O'Connor and Ms Porter are solicitors employed by the council legal services department. They have been communicating with you on behalf of the council.

You reported to us that both had engaged in repeated breaches of our Principles and Code of Conduct, including misrepresentation of data rights, obstruction of subject access, discriminatory language, and a failure to act on legal obligations relating to surveillance and data protection. You believe that their conduct directly undermined your ability to seek redress before the Investigatory Powers Tribunal.

Your report was assessed by our Investigation Officer (IO), Mr Rayhan. Having made his decision, he informed you of it in his letter of 31 July 2025. It explained that we have concluded that our Standards and Regulations have not been broken based

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upon the material that you have provided. The IO also assessed that there was no requirement for us to act further. Ultimately, both solicitors are acting within their roles to present the case of their employer, Herefordshire County Council. There was nothing within their communications with you that the IO considered to have breached our rules, or gone beyond the robust language used in outlining potential litigation.

It is difficult to write concisely how something doesn't breach our rules when we have found that there is no case to answer. As a result, the IO has not demonstrated to you how your information does not show a breach of our rules. I discuss this point further below.

Instead, to assist you in understanding our process, within his letter the IO provided links to relevant information on our website that explains our Assessment Threshold Test (ATT) and how we apply it. He also provided other links about our investigation and decision-making process.

Our service to you

I read your comprehensive letters of complaint, and my review has been guided by them. I can see that you have taken time and care to set out your concerns fully. In response our letters to you should explain the reasons for our decisions. However, it is often not proportionate or practical to respond to every point that has been made, and I have not done so as the remit of my review is to gauge our service to you.

The questions that you have raised require us to fully explain our thinking, or to demonstrate how we have formed a particular view. We do not and have never claimed, to offer this level of explanation. What we should do is provide a clear and definitive decision based upon our assessment. Having read our letters and emails to you, I am of the view that we have met that standard**.**

You are concerned that the reasons for your service complaint have been incorrectly understood, and that as a result failings by us to adhere to our own policies and procedures have not been correctly identified and addressed. You have stated that your complaint has been reduced to a focus on our outcome only, and in your email of 19 August you make the point that yours is not an appeal against our outcome.

However, I must say that your challenge of our process is concluded by a request for us to review our decision in light of failings. Ultimately, in my view your service complaint does appear to be grounded in a dissatisfaction with our assessment and outcome.

As I have already explained, I do not investigate this case as part of my review. However, I do look at the steps that the IO took to assess the conduct of those complained about. I gauge whether or not his actions were appropriate to determine if we needed to act further. I then consider if the assessment and the subsequent decisions were fair. Having read the file, I consider that the IO has acted

appropriately, and a reasonable assessment made against both our Standards and Regulations, and our Enforcement Strategy.

We set the standards and regulations that we expect the legal professionals we regulate to abide by, and these are designed to ensure a quality and ethical service. We do rely heavily on the public reporting their concerns to us, and we welcome each report. However, as the regulator it is for us to decide if there is indeed a risk to the public or the integrity of the legal profession, and we assess whether our Standards and Regulations have been breached. In exercising our responsibility, we are not seeking or promising to provide any outcome to the satisfaction of any individual.

Ms Salh conducted a review of your complaint about our service at stage one of our policy. She provided you with her findings in her letter of 5 September 2025. Her explanation of the action and decision of the IO added to Mr Rayhan's earlier correspondence. I do not believe that she had misunderstood your concerns, and her review and letter are to an appropriate standard. Her recommendation that your concerns are more appropriately for the Information Commissioner seems reasonable.

Summary

In summary, I found that our handling of your report was reasonable based upon the material we have seen. I could not find any reason to recommend further activity, nor could I find that we had acted incorrectly. We thank you for bringing forward your honestly held concerns, and do understand that you may be frustrated by our decision that no action is required.

You have also asked if we will now conduct a review of our decision. I do not see that there are grounds to conduct a review under part 3.2 of our rules, as I have not identified any failings in our actions.

This concludes my review of your concerns at stage two of our complaints process, and is the end of my involvement at this time. You do have the opportunity for our handling of your complaint to be independently reviewed. I have included details of how to do this below.

Yours sincerely

[redacted]

Sean Kent
Corporate Complaints Officer
Chief Executive's Directorate

Solicitors Regulation Authority/Awdurdod Rheoleiddio Cyfreithwyr
Email: s[redacted].k[redacted]@sra.org.uk

If you remain dissatisfied

If you are unhappy with our handling of your complaint about our service, you can have it reviewed by the Independent Reviewer. However, this would not include any disagreement about our decision, in this case not to act against Mr O'Connor or Ms Porter.

It can review our service to you, for example, whether we have answered your concerns, explained matters clearly and followed our procedures and timescales. You can find more information about its remit at www.sra.org.uk/sra/complaints/complaints-policy.page (paragraph 67).

To request a review of your complaint, please contact the Independent Reviewer **within 20 working days i.e., by 1 November 2025**

How to contact the Independent Reviewer (CEDR)

By email: complaintsreview@cedr.com

By post:
Centre for Effective Dispute Resolution (CEDR)
100 St. Paul's Churchyard,
London
EC4M 8BU
United Kingdom

By phone: 020 7536 [redacted]