

CURRENT GUIDANCE

First Tier Complaints Handling Guidance

Purpose

- i. This guidance supplements Section D1 of the Code of Conduct in the BSB Handbook. It covers two areas:
 - a. the scope of complaints handling by self-employed barristers, chambers and BSB entities, including relevant definitions
 - b. the obligations in relation to complaints handling and arrangements, and guidance to self-employed barristers, chambers and BSB entities in developing complaints handling procedures
- ii. The key outcomes of Section D1 of the Code of Conduct in the BSB Handbook are (1) clients are provided with appropriate and accessible information about redress, know that they can make a complaint if dissatisfied, and know how to do so, including any rights they may have to make a second-tier complaint,¹ (2) complaints are dealt with effectively, efficiently, and are resolved fairly and promptly,² and (3) clients are kept informed throughout the complaints process.³
- iii. Self-employed barristers, chambers and BSB entities must have complaints handling procedures in place per rules C99-C109 of the BSB Handbook (the ‘complaints rules’). This guidance supplements the complaints rules by setting out the scope of complaints (i.e. what is considered a complaint), and the scope of clients (i.e. which clients the complaints rules apply to).

¹ Outcome C26 of the BSB Handbook.

² Outcome C27 of the BSB Handbook.

³ Outcome C27 of the BSB Handbook.

Summary and Contents

This document provides guidance in the following areas – click to follow:

[Part A](#)

[Scope of complaints handling by self-employed barristers, chambers, and BSB entities, including relevant definitions](#)

This section provides an overview of the complaints rules and associated guidance on definitions and scope.

[1.1 Complaints](#) – sets out guidance on the definition of complaints

[1.2 Clients and complainants](#) – sets out the guidance on the definition of clients and complainants

[1.3 First and second-tier complaints](#) – sets out the guidance on the definition of first and second-tier complaints

[1.4 - Service complaints](#) – sets out what is in scope of first and second-tier complaints, i.e. service-related complaints

[1.5 Misconduct and professional negligence](#) – sets out guidance on what to do if a complaint relates to misconduct or professional negligence

[1.6 Bar Mutual Indemnity Fund](#) – sets out guidance on what should be done with respect to BMIF if a complaint makes an allegation of negligence

[1.7 Non-client complaints](#) – sets out guidance on non-client complaints, including how the Legal Ombudsman treats such complaints

Part B

The obligations in relation to complaints handling and arrangements and guidance to self-employed barristers, chambers and BSB entities in developing complaints handling procedures

This section provides guidance and suggestions on how the complaints rules can be complied with.

2.1 Overview of the complaints rules - this section provides an overview of the BSB Handbook complaints rules, which implement the Legal Services Board's section 112 first-tier complaints requirements

2.2. Additional guidance: notifying the client of the right to complain - this section provides additional guidance on the client notification requirements with regards to their rights to raise complaints

2.3 Additional guidance: complaints to the Legal Ombudsman - this section provides additional guidance on the scope and requirements in relation to complaints that are within the scope of the Legal Ombudsman, and what information needs to be provided to clients about the scheme

2.4. Additional guidance: compliance with requirements to notify clients - this section provides additional guidance on how to comply with client notification requirements.

2.5 Client information sheets - this section provides guidance on how notification requirements may be complied with using client information sheets, including providing information in alternative and accessible formats, tailored to specific client needs.

2.6 Compliance - this section provides an overview of how the BSB will assess compliance in circumstances where it would be impractical to fully comply with requirements, in individual cases.

2.7 Cases where the procedure cannot be followed - this section provides details of how best to comply with requirements where barristers may face difficulties or cases where an initial contact with a client is not possible

[2.8 Chambers complaints procedure: guidance](#) - this section includes guidance to chambers to assist them to develop a complaints procedure which is compliant with the mandatory requirements set out at Section D1 of the Code of Conduct in the BSB Handbook. It will also be useful for BSB entities.

[2.8.a Chambers complaints procedure: first stage](#) - provides guidance on how to initially deal with client complaints

[2.8.b Chambers complaints procedure: second stage](#) - provides guidance on how to handle complaints that have not been resolved at the first-initial stage by the chambers.

[2.9 Charging for complaints](#) - provides guidance highlighting that complaints procedures must be free of charge.

[2.10 Confidentiality](#) - provides guidance on client and complainant confidentiality in relation to complaints

[2.11 Record keeping](#) - provides guidance on the requirement to keep records of complaints

[2.12 Review and monitoring](#) - provides guidance on how complaints records need to be reviewed and monitored, and actions that must be taken

[2.13 Complaints Data Collection and Submission](#) - sets out an overview of new first-tier complaints data collection and submission requirements that must be followed. Full guidance is set out in the [BSB's First-tier Complaints Data Policy Statement](#).

[Part C](#)

[Model Procedures for Complaints](#)

This section provides model complaints procedures based on guidance included within this document, for chambers and sole practitioners. These models will also be useful for BSB

entities – they can make the necessary changes applicable to their organisation.

[Appendix 1 – Model chambers complaints procedure for multi-member sets](#)

[Appendix 2 – Model complaints procedure - sole practitioners](#)

Part A. Scope of complaints handling by self-employed barristers, chambers and BSB entities, including relevant definitions

1. Definitions and Scope

1. This section sets out guidance on the scope of BSB Handbook complaints handling rules.

1.1 Complaints

2. The BSB Handbook defines complaints as: a complaint made by a client about the standard of service received that is addressed either to the Legal Ombudsman or the chambers, BSB entity or BSB authorised person (i.e. self-employed barrister).

3. As defined in the BSB Handbook, which implements the Legal Services Board's latest section 112 FTC requirements definition of complaints, such complaints encompass those communicated orally or in written format and can include an expression of dissatisfaction which alleges that the complainant has suffered (or may suffer) financial loss, distress, inconvenience, or other detriment.

4. General queries or requests for general information, such as query about costs are not to be considered as a complaint. Vexatious or frivolous complaints do not fall under the definition of a first-tier complaint – however each complaint must be assessed on its own merits.

1.2 Clients and Complainants

5. A client, for the purposes of the complaints handling rules as defined by the BSB Handbook, means those who the authorised person acts for, including prospective and former clients, who are:

- a. individuals;
- b. a business or enterprise that is a micro-enterprise;
- c. a club/association/organisation, the affairs of which are managed by its members, that has an annual income net of tax of less than £1 million;
- d. a trustee of a trust that has an asset value of less than £1 million;
- e. a personal representative or beneficiary of the estate of a person who, before they died, had not raised a complaint with the authorised person.

6. Once a client makes a complaint, which is in scope of the definition of a complaint, and the scope of clients who can make a complaint (for the purposes of the Handbook complaint handling rules), they are referred to as 'complainants' in the Handbook rules.

1.3 First and Second Tier Complaints

7. A first tier complaint is one that may be made by a complainant to the barrister, chambers or BSB entity about their services. A second-tier complaint is one that may be made by a complainant to the Legal Ombudsman. Second-tier complaints can be taken forward by a complainant if they are dissatisfied with the outcome of their first-tier complaint, or if the barrister, chambers or BSB entity fails to resolve it to the complainant's satisfaction eight weeks after the complaint is made.

8. This guidance draws a distinction between complaints that relate to service, professional negligence and misconduct. A single complaint may have elements of all three and the obligations on chambers are different for each aspect.

1.4. Service complaints

9. The requirements set out in Section D1 of the Code of Conduct relate to the handling of service complaints which are within the jurisdiction of the Legal Ombudsman.

10. Chapter 2 of the Legal Ombudsman's scheme rules set out the types of complaints that are within its jurisdiction.⁴ These are complaints that relate to an act or omission by an authorised person in relation to services provided to the complainant (directly or indirectly).

11. In addition, the Legal Ombudsman's website sets out a non-exhaustive list⁵ of the most common type of complaints that it investigates and provides case studies which give more examples of complaints they investigate and the remedies they can award. These include issues around costs, delays and poor information.

12. Disputes about costs are the most common complaint the Legal Ombudsman deals with. The provision of clear information before work starts is the best way of avoiding such complaints. The Legal Ombudsman has produced useful information, case studies and guidance on their website to assist legal services.⁶

⁴ Legal Ombudsman scheme rules are available on their website: <https://www.legalombudsman.org.uk/who-we-are/corporate-publications/scheme-rules/>

⁵ See here: <https://www.legalombudsman.org.uk/information-centre/how-we-work/common-complaints/>

⁶ Information about costs complaints is available here: <https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/preventing-complaints/complaints-about-legal-costs/>. Ombudsman guidance on costs complaints ("An Ombudsman's View of Good Costs Services, 3rd Edition) is available here: <https://www.legalombudsman.org.uk/information-centre/news/updated-guidance-on-complaints-about-costs/>

1.5 Misconduct and professional negligence

13. Chambers may not be best placed to seek to resolve or provide redress for complaints which relate to misconduct or professional negligence, and there is no positive obligation to investigate matters of misconduct.

14. However, it is likely that in many cases a complaint which raises issues relating to professional misconduct or professional negligence will also amount to an accusation of the provision of poor service or will include a service element. Where this is the case, the service issues should be dealt with in accordance with Section D1 of the Code of Conduct. It is not acceptable for chambers not to investigate elements of a complaint which relate to service because the complaint also amounts to, or includes elements which relate to, misconduct or could potentially give rise to a negligence claim.

15. Complainants should be informed in writing if any aspects of their complaint are deemed to be outside of chambers complaints handling procedures. This should include information on how to complain to the Legal Ombudsman.

Barristers are also reminded that they must report promptly to the BSB if they have committed serious misconduct. In addition, subject to their duty to keep the affairs of each client confidential, barristers must report to the BSB if they have reasonable grounds to believe that there has been serious misconduct by another barrister. The relevant provisions of the BSB Handbook are Rules C65 – C69 and Guidance C95 – C102. Guidance C96 in particular provides examples of what serious misconduct includes without being exhaustive. Further guidance on reporting serious misconduct of others is also available on the BSB's website.

1.6 Bar Mutual Indemnity Fund

16. Where a complaint raises an allegation of negligence it may be appropriate to inform BMIF and to consult them before any proposals for resolution are made to the client.

1.7 Non-client complaints

17. The Legal Ombudsman will only deal with complaints from consumers of lawyers' services.⁷ This means that generally complaints from barristers' clients fall within the Ombudsman's jurisdiction, although they will accept complaints from non-clients where permitted by their Scheme Rules See the Legal Ombudsman guidance⁸ and their Scheme Rules for further details

18. This does not mean that non-client complaints should not be investigated by chambers. Some non-client complaints, such as discourtesy, may be capable of resolution by chambers. However, the BSB recognises that chambers' ability to resolve many kinds of non-client complaints is limited and that they are more suited to consideration under the disciplinary processes of the BSB. Accordingly, if chambers feel that the issues raised by non-clients cannot be satisfactorily resolved through the chambers complaints process they should refer the complainant to the BSB.

⁷ Rules 2.1 – 2.10 of the Legal Ombudsman Scheme Rules (April 2023 edition) set out who can complain and what they can complain about. See here: <https://www.legalombudsman.org.uk/who-we-are/corporatepublications/scheme-rules/>

⁸ See here: <https://www.legalombudsman.org.uk/for-legal-service-providers/learning-resources/guidancescheme-rules/>

Part B. The obligations in relation to complaints handling and arrangements and guidance to self-employed barristers, chambers and BSB entities in developing complaints handling procedures

2.1 Overview of the complaints rules

19. The Legal Services Board (LSB) have specified a requirement to which the BSB is obliged to give effect under s112(2) of the Legal Services Act 2007. The requirement relates to "first-tier" complaints which, so far as self-employed barristers are concerned, relate to the procedure whereby a client makes a complaint to barristers, chambers and BSB entities in the first instance.

20. The BSB Handbook sets out the rules (C99-C109) for dealing with first-tier complaints and notifying clients about their rights to escalate complaints to the Legal Ombudsman, which implement LSB's requirements.

21. Self-employed barristers, chambers and BSB entities must have, and maintain a first-tier complaints handling procedure in place. Complaints handling procedures must provide for complaints to be assessed competently, diligently and impartially; responded to fairly, consistently, and promptly; and to be resolved at the earliest opportunity.

22. Complaint handling processes must be convenient and easy to use (in particular for those that are vulnerable or have disabilities). They need to make provision for complaints to be made by any reasonable means. The way in which complaints are dealt with must be transparent and clear in relation to process, well publicised, prominent, accessible and free. The process itself should be prompt and fair, with decisions based on a sufficient investigation of the circumstances. Where appropriate, there should be an offer of a suitable remedy.

23. The complaints handling procedure must:

- Enable clients to make a complaint free of charge
- Is prominent and accessible
- Set out the steps that will be taken in resolving a complaint
- Explains how a complaint will be handled
- Provides information on the possible outcomes of a complaint
- Is effectively communicated to each client in a format or formats reasonably tailored for the client's circumstances, having due regard to their information needs, and
- Makes provision for a client to be able to make a complaint in a way that is reasonable and accessible to the client.

24. Complaints handling procedures must be:

- Documented in writing, and available across your organisation, where relevant
- Endorsed by the appropriate member/committee of chambers, or head of legal practice, or person responsible for the implementation of the complaints procedure
- Implemented consistently and periodically reviewed.

25. When designing complaints handling procedures, barristers/chambers/BSB entities should design them in a way to ensure they are accessible to all who may need to access them, recognising that people have different needs, including for example, disability, neurodiversity and digital inclusion, and that some clients may be in vulnerable circumstances, including permanent or temporary vulnerability.

26. Complaints handling procedures, and information provided to clients, must be effectively communicated to each client in a format tailored to the client's circumstances, having due regard to their information needs. As the LSB notes in the statutory guidance, this might include ensuring that information about how to make a complaint is made available in a

variety of formats as well as in writing, for example, via diagrams, short video clips or animation, and via a range of media (e.g. electronically and in hard copy), where reasonable.

27. Complaints handling procedures must also make provision for a client to be able to make a complaint in a way that is reasonable and accessible to them. This may include providing for complaints to be made in a range of ways – such as in writing, telephone or video call, where reasonable.

28. It is important that complainants are not disadvantaged by making a complaint, for example making a complaint should not result in delays to the progress of their case, or subjected to behaviour that is contrary to an authorised person’s professional principles, including maintaining proper standards of work and acting in their client’s best interests.

29. When receiving a complaint from clients, barristers, chambers and BSB entities need to provide a prompt acknowledgement, including clear and comprehensive information about the procedure that will apply and how the complaint will be handled. As the LSB notes in their statutory guidance, it can be helpful for the authorised person to liaise with the complainant at the outset to establish what the complaint is about, what resolution the complainant is hoping for, and the timescale for investigating the complaint, including whether the resolution sought is within the power of the barrister/chambers/BSB entity to grant. This approach can help reduce misunderstanding and manage expectations.

30. Complainants will also need to be provided with information about who to contact in relation to their complaint, and the steps and timelines for resolution of their complaint, including possible outcomes. Barristers/chambers/BSB entities must provide regular updates on the progress of the complaint and should be proactive in communicating with the complainant during the investigation of their complaint and update the complainant if there is delay or if more information is required before further progress can be made.

31. Communication must be in plain and appropriate language. Care should be taken to ensure correspondence with complainants is professional and empathetic in tone. An apology should be offered in resolution of complaints if appropriate.

32. The outcome of the complaint must be communicated promptly to the complainant, and if the outcome includes any offer of suitable remedy, comply promptly with the remedy or remedial action if accepted by the complainant.

33. If the complainant is dissatisfied with the outcome of the complaint, they must be offered further information about options available, including any rights the complainant may have to escalate their complaint to the Legal Ombudsman, how to complain to the Legal Ombudsman, time limits for doing so, information about how to make a complaint that is available from the Legal Ombudsman, and full details of how to contact the Legal Ombudsman.

2.2. Additional guidance: notifying the client of the right to complain

34. Barristers, chambers and BSB entities must inform clients about their right to complain, their complaint handling process, and the Legal Ombudsman's role. This information should be provided in accessible formats, including via client care letter or other appropriate channels.

35. This information must generally be provided at the time of engagement/instruction, or if that is not practicable, at the next earliest appropriate opportunity, and at the conclusion of the matter. Where it is appropriate and proportionate, this information must also be provided if asked for by a client and a complaint is made during the course of the matter.

36. As the Legal Services Board notes in their first-tier complaints [statutory guidance](#), in instances where the time of engagement and the conclusion of the matter are very close in time, it may be sufficient to provide this information only once.

37. Barristers, chambers and BSB entities must notify clients in writing, or in accessible formats tailored to specific client information needs:

(a) Of their right to make a complaint, including your first-tier complaints handling procedure, how and to whom this can be done, the timeframes for doing so;

(b) That after eight weeks following the making of a first-tier complaint, if the complaint has not been resolved to the client's satisfaction, that they may have a right to complain to the Legal Ombudsman (which has responsibility for dealing with all service complaints against legal professionals), including any time limits;

(c) That the lay client may complain directly to you, chambers or BSB entity without going through solicitors; and

(d) Of the name and web address of an approved alternative dispute resolution (ADR) body which can deal with any complaint in the event that: the barrister is unable to resolve the complaint through their complaints process, *and* both the barrister and the client agree to use the scheme. The barrister is therefore not required to use ADR, and is only required to inform the client of the option. This is a requirement under the Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015.

38. The barrister must also notify the client in the same letter or accessible format, of the name and web address of an ADR body which would be competent to deal with the complaint. However, it should be noted that neither the barrister nor the client is required to use ADR. The only requirement is for the barrister to inform the client of the option, and the client retains their right to complain to the Legal Ombudsman provided they fall within their jurisdiction.

39. The Chartered Trading Standards Institute (CTSI) approves ADR entities which are able to provide mediation services. A list of approved ADR entities which can be used for legal services is set out in the CTSI [website](#). Barristers should consider which provider may be the most appropriate for them and the client. Barristers should also be aware that the time limit for contacting an ADR approved body will likely be different to the time limit for contacting the Legal Ombudsman, and they should make the client aware of the time limit in the letter. If the barrister and the client use mediation, neither party is required to accept the proposed resolution. If mediation does not resolve the complaint, the client may still make a complaint to the Legal Ombudsman (provided they fall within their jurisdiction and they do so within the time limit).

If the barrister and the client use a separate arbitration scheme, the outcome will be legally binding and the parties will need to agree to this. In itself, this does not prevent the client from then making a complaint to the Legal Ombudsman. However, the Legal Ombudsman reserves the right to dismiss any complaint if it feels that a comparable independent complaints (or costs-assessment) scheme has already dealt with the same issue satisfactorily. Barristers may also consult the [CTSI](#) website to identify bodies for arbitration.

2.3 Additional guidance: complaints to the Legal Ombudsman

40. Most consumers will be able to make a complaint to the Legal Ombudsman about the services they received after the complaints process has concluded. Sufficient information must be provided to all clients to identify whether they do have a right to take their complaint to the Legal Ombudsman, and to contact the Legal Ombudsman direct to clarify whether they can (clients will also need to be informed about ADR – see above).

41. Please note that the Legal Ombudsman has time limits in which a complaint must be raised with them. From 1 April 2023, the time limits are:

- a) The complainant must refer the complaint to the Legal Ombudsman no later than

one year from the act/omission, or one year from when the complainant should reasonably have known there was cause for complaint.⁹

b) The complainant must also refer the complaint to the Legal Ombudsman within six months of the complaint receiving a final response from their lawyer, if that response complies with the requirements in rule 4.4 of the Scheme Rules (which requires the response to include prominently an explanation that the Legal Ombudsman was available if the complainant remained dissatisfied, and the provision of full contact details for the Ombudsman and a warning that the complaint must be referred to them within six months).

42. Barristers, chambers and BSB entities must have regard to that timeframe when deciding whether they are able to investigate a complaint. Chambers will not therefore usually deal with complaints that fall outside of the Legal Ombudsman's time limits. The Ombudsman can extend the time limit in exceptional circumstances.

43. Clients who have, or may have, a right to complain to the Legal Ombudsman¹⁰ must at the start, during the course of the matter, and at conclusion of the matter be informed of their right to complain to the Legal Ombudsman, the timeframe for doing so and full details

⁹ See: <https://www.legalombudsman.org.uk/media/xfrfzben/guidance-scheme-rules-april-2023.pdf> and the Legal Ombudsman scheme rules: <https://www.legalombudsman.org.uk/media/oughytel/scheme-rules-april-23-final.pdf>

¹⁰ Those clients who are able to complain to the Legal Ombudsman are as follows:

- a) Individuals;
- b) Businesses or enterprises that are micro-enterprises within the meaning of Article 1 and Article 2(1) and (3) of the Annex to Commission Recommendation 2003/361/EC (broadly businesses or enterprises with fewer than 10 employees and turnover or assets not exceeding €2 million);
- c) Charities with an annual income net of tax of less than £1 million;
- d) Clubs, associations or organisations, the affairs of which are managed by its members or a committee of its members, with an annual income net of tax of less than £1 million;
- e) Trustees of trusts with an asset value of less than £1 million; and
- f) Personal representatives or beneficiaries of the estates of persons who, before they died, had not referred the complaint to the Legal Ombudsman.

of how to contact the Legal Ombudsman (clients will also need to be informed about ADR-see above), including during the case if asked for by the client (or if they complain).

44. Where a barrister accepts instructions from a new client, or instructions on a new matter from an existing client, the client must be notified of the right to make a complaint, how and to whom this can be done. It is essential that systems be set up by barristers and/or chambers and BSB entities to ensure that these requirements are properly complied with. This will be straightforward for Public Access clients, but because self-employed barristers will usually be instructed by a solicitor or other professional client on behalf of the client, procedures must be put in place for notifying other clients.

2.4. Additional guidance: compliance with requirements to notify clients

45. The LSB has specified a requirement that the BSB must require all individuals and entities they regulate to notify all clients in writing at the time of engagement, or existing clients at the next appropriate opportunity, and at the conclusion of the matter, of their right to make a complaint, how and to whom this can be done (including their right to complain to the Legal Ombudsman at the conclusion of the complaint process, the timeframe for doing so and full details of how to contact the Legal Ombudsman). Additionally, clients will need to be provided this information if asked for during course of the matter. Clients will also need to be informed about ADR – see above.

46. The BSB is required to enforce the LSB requirement and compliance by barristers, chambers and BSB entities. The BSB will, as part of its supervision processes, monitor providers to ensure that the requirement is being complied with.

47. The guidance below is set out to assist barristers and Chambers (and BSB entities) in setting up systems to effect compliance with the requirement of the LSB in a way that is neither disproportionate nor onerous.

48. Where the barrister is aware of the contact details for the client, the obligation can be satisfied by a letter or e-mail sent directly to the client (which may be sent by someone else on the barrister's behalf) providing the required information, or in formats which are tailored to the client's specific information needs.

49. If the information has not been provided beforehand in writing, or in accessible formats tailored to the client's information needs, it may be provided on the first occasion that the barrister meets the client at court, or in conference.

50. Subject to the points made below, it is not acceptable for barristers simply to make the information available to solicitors. Nor is it sufficient that the information is available on chambers' website. There is a positive obligation on the barrister to provide it to the client, and if applicable, in accessible formats.

51. An unequivocal agreement by the professional client to pass on chambers' complaint information to the client (including in accessible formats where required), either in a particular case, or in relation to each case in which a member of chambers is instructed by that professional client, will serve to discharge the obligation to provide the client with the information. However, there must be a positive agreement on the part of the professional client: silence is not sufficient. Where chambers receive high volume instructions from a particular professional client it will not be necessary to obtain written confirmation in relation to each instruction. In those circumstances, positive written confirmation should be obtained at regular and reasonable intervals from the professional client that complaints information continues to be passed on to lay clients.

2.5 Client information sheets

52. Some barristers may be unhappy at the prospect that the first thing they do when they meet the client is to advise the client how to make a complaint. A "client information sheet" is one way in which the information may be communicated to the client. The information

sheet giving details about the barrister as well as information on how to complain could be given to the client by the barrister. Whilst the information sheet carries the necessary information, it also carries helpful information for the client about the barrister and should not give rise to any negative impression. The client information sheet may be sent or handed out to the client; it may also be provided by the clerk or receptionist when the client arrives for a conference. Barristers, chambers and BSB entities will also need to ensure that this information is accessible and provided in tailored formats specific to client information needs. These can be, for example, videos, animations, diagrams or other formats that provides details about your complaint handling process. The key is that the information is provided in a way that is accessible to the client's specific needs.

2.6 Compliance

53. It is recognised that there will be circumstances in which, in individual cases, it is impractical to comply strictly with the requirements. What is important is that barristers, chambers and BSB entities set up systems, and establish procedures, to effect compliance with these requirements consistent with this guidance. The precise solutions will differ according to different fields of practice. If this has been done responsibly, then as part of its supervision processes the BSB will regard sympathetically particular difficulties which occur, or are likely to occur, in individual cases.

2.7 Cases where the procedure cannot be followed

54. Where the barrister has the contact details of the client, or when the barrister meets the client in the course of the matter, compliance should not in general present a problem.

55. However, there will be areas of practice, and particular cases, where it is not possible or practical for the barrister to satisfy the notification requirement in this way. For example, the barrister may not have the contact details of the client, cannot readily obtain them, and does

not anticipate meeting the client in the course of being instructed or at least not for some time.

56. Some common sense is required in setting up procedures to fulfil the notification requirements. For example, it should be possible to agree a standing arrangement with solicitors with high-volume instructions where your complaints process details are provided to the lay client.

57. In some cases there will be no realistic alternative to compliance by providing the requisite information to the solicitor or other professional client with instructions to provide that information to the client on behalf of the barrister, even when the solicitor has not expressly agreed to do so. But this course should only be adopted when other better means of compliance are not practical.

2.8 Chambers complaints procedure: guidance

58. This guidance is provided to chambers to assist them to develop a complaints procedure which is compliant with the mandatory requirements set out at Section D1 of the Code of Conduct in the BSB Handbook. Chambers are not obliged to follow the guidance absolutely. If chambers decide not to adopt the model procedure provided at Appendix 1 below, they should have regard to this guidance when devising their own complaints handling arrangements. This information will also be useful for BSB entities.

59. All barristers must be familiar with the requirements of Section D1 of the Code of Conduct in the BSB Handbook, and the requirements of the Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015 in respect of informing clients about ADR (see paragraphs 11(c) and 13 above).

60. Those barristers who are responsible for dealing with complaints should ensure that they and any staff who deal with complaints are adequately trained. The BSB will monitor

chambers complaints handling, including the sufficiency of training, as part of its supervision processes.

61. This annex sets out the contents of an effective procedure. Model complaints procedures are at Appendix 1 (multi member sets of Chambers) and Appendix 2 (sole practitioners). Chambers must ensure that their website and brochure, and other formats tailored for specific client information needs, carries information about the chambers complaints procedure.

62. Chambers are not obliged to adopt the model complaints procedures provided below. The model procedures set out good practice arrangements for handling complaints, but the BSB is aware that there are alternative methods which may be just as effective. Chambers have discretion to either devise their own procedure, or to amend the model procedure to best fit their own administrative arrangements or the particular circumstances of a complaint. The requirements are that Chambers adopts a complaints procedure that includes the mandatory requirements set out at Section D1 of the Code of Conduct in the BSB Handbook, and the requirements of the Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015 in respect of informing clients about ADR (see above), as well as being designed in a way that meets the mandatory requirements.

2.8.a Chambers complaints procedure: first stage

63. Where a client is dissatisfied, or expresses dissatisfaction, with some aspect of the service provided by a barrister or by chambers they should be invited to speak to, or engage with an individual nominated under the chambers complaints procedure to deal with complaints; for example, the Chambers Director, Practice Manager or Head of Chambers, either by phone, video call, or other accessible communication methods tailored to the client's specific needs. Once a client makes a complaint, they are referred to as the complainant, in this guidance and the BSB Handbook definitions.

64. In order to ensure consistency of approach, this individual should be the first point of contact for all complaints. The client should also be told that if they prefer they may make the complaint in writing (or other accessible methods of communication), and the chambers complaints procedure should be sent to them unless it has already been provided (including in accessible formats). Chambers may choose to give explicit reassurance to the complainant that their complaint will be taken seriously, and that the person investigating the complaint has no prior involvement in the complainant's case, where reasonable and proportionate.

65. Where a complaint is made by telephone or video call (or other forms of accessible communication), a note of the complaint should be made. It should record:

- The name and address of the complainant;
- The date of the complaint;
- Against whom the complaint is made;
- The detail of the complaint; and
- What the complainant believes should be done about the complaint.

66. In many cases the complaint will be resolved over the telephone, video call, etc. during the first engagement. When that occurs, the individual nominated to deal with complaints should record the outcome on the note of complaint. The client should be asked whether they are satisfied with the outcome and informed of the Legal Ombudsman's complaints procedure, and any rights they may have to escalate their complaint to the Legal Ombudsman. If they are, that fact will be recorded. The complaints procedure should suggest that the client may wish to make their own note. If the client is not content they should be invited to put the complaint in writing (or in a format that is suited to the client's communication needs) so that it may be investigated formally. At that stage they should be sent a copy of the chambers complaints procedure unless it has already been provided. The client should also be informed of the Legal Ombudsman's complaints procedure.

2.8.b Chambers complaints procedure: second stage

67. It is recommended that chambers set up a complaints panel made up of experienced practitioners from different practice areas and a senior member of staff. A head of panel should be appointed. There should be a nominated deputy. All complaints (other than those resolved at stage one) should be put before the head of the panel or, in their absence, the deputy. The role of the panel is to appoint from its members an independent person to investigate a complaint and to ensure that all complaints are handled consistently and in accordance with the chambers complaints procedure.

68. Broadly, all complaints need to be assessed competently, diligently and impartially. Chambers and BSB entities need to strive to resolve complaints at the earliest opportunity, and respond to complaints fairly, consistently and promptly. Complaints procedures and handling, including information and engagement with the client, needs to be conducted in a way that is tailored to the client's specific information needs.

69. It may not be appropriate or possible for a small set of chambers to convene a complaints panel. Chambers are encouraged to set up a complaints panel where possible or otherwise nominate an individual or individuals to investigate the complaint.

70. Sole practitioners may not feel able to investigate independently a complaint raised against them and, if a complaint remains unresolved, should therefore offer for an independent person (for example, a barrister in another chambers) to investigate the complaint. A suggested approach to this is set out in the model procedure for sole practitioners at Appendix 2 below.

71. A complaint received in writing (or in alternative accessible formats that the client has chosen to communicate with you) should, where possible, be acknowledged within two days of receipt and, in any event, promptly. Within 14 days of that acknowledgment the head of the panel (where one has been set up) or their deputy should appoint a member of the

panel to investigate the complaint. Where the complaint is against a member of staff the person appointed will normally be the senior staff member. Where the complaint is against the senior staff member the head of the panel should appoint another member of the panel to investigate. Where the complaint is against the head of the panel, the Head of Chambers should investigate or, in their discretion, appoint a member of the panel to investigate. Where the Head of Chambers is the head of the panel, the deputy head of the panel should be the appointed person. No barrister should investigate a complaint of which they are the subject. Where no panel has been established, chambers should ensure that the individual or individuals nominated to investigate the complaint are impartial.

72. The appointed person/nominated individual should write to the client as soon as they are appointed, or communicate in a format that is accessible to the client's specific information and accessibility needs. They should inform the client that they are to investigate the complaint and that they will report back to the client within 14 days. If it becomes plain that a response cannot be sent within 14 days a realistic timeframe should be set and the client informed accordingly.

73. The appointed person/nominated individual should investigate the complaint. They should speak to the barrister/member of staff complained against, and any other people they identify as having something to contribute. They should review all relevant documents. If necessary, they should revert to the client for further information and clarification.

74. The complainant needs to be updated regularly with progress of the complaint investigation.

75. The appointed person/nominated individual should prepare a report to the client (with a copy to the barrister/member of staff complained against). The report should set out all the matters referred to at paragraph 67 above, the nature and scope of the investigations carried out in respect of each complaint, their conclusions and the basis for their conclusions. The report should be drafted using clear and concise language. Where a

complaint is found to be justified, the report should provide proposals for resolution (e.g. reduction in fees, apology, compensation, etc.).

76. The report should be sent to the client within 14 days of the appointed person's appointment, or such longer period as has been communicated to the client in advance (see paragraph 74). Note that the client will be entitled to take their complaint to the Legal Ombudsman if they do not receive a final response from you within eight weeks of their initial complaint. A copy of the report should also be provided to the barrister/member of staff complained against.

The Legal Ombudsman's website has a number of helpful resources for legal professionals, including how to signpost clients to the Legal Ombudsman, good practice in handling complaints and use of language when responding to complaints:

<http://www.legalombudsman.org.uk/>

2.9 Charging for complaints

77. Chambers must not charge clients for dealing with their complaint and should not charge for using mediation services if used. The LSB requirements, and the BSB Handbook specifically require complaints handling to be free of charge.

2.10 Confidentiality

78. All conversations and documents shall be confidential and disclosed only to the extent necessary. They may be disclosed only to the client, the person complained about, the Head of Chambers, the head of the complaints panel or relevant senior member of the panel, the nominated individual, the management committee (for carrying out the task at paragraph 77) and any other individual with whom enquiries need to be made for the purpose of the investigation.

2.11 Record keeping

79. Where the procedure ends after the first stage, the person responsible for recording the outcome on the note of complaint should ensure that the note of complaint is placed on the chambers complaints file.

80. Where the procedure ends after the second stage, the head of the panel/nominated individual should ensure that the following documents are placed on the chambers complaints file:

- Note/letter of complaint (see paragraph 67); and
- Appointed person's/nominated individual's report (see paragraph 77).

2.12 Review and monitoring

81. The chambers complaints file should be inspected regularly by the management committee. Papers should be anonymised where necessary. The person responsible for the administration of the system should report at least annually to such appropriate committee of chambers on the number of complaints received and the subject area of the complaints. In such a report all the details should be anonymised.

82. The complaints should be reviewed for trends, risks or issues. Reviews also need to include possible systemic issues in how complaints have been assessed, and resolved, and any service issues. Measures must be implemented to address those risks and issues. Appropriate training must be considered and undertaken, including provision of appropriate resources, to address the identified risks and issues.

83. As part of its supervision processes the BSB will monitor chambers complaints handling including, where appropriate, the sufficiency of training. All barristers must comply promptly with requests for information from the BSB.

2.13 Complaints Data Collection and Submission

84. The Bar is required to collect and submit complaints data to the BSB on an annual basis. The [BSB's FTC Policy Statement](#) sets out what data needs to be collected, and how it will be submitted to the BSB.

June 2026

Bar Standards Board

Part C. Model Procedures for Complaints

The model procedures for chambers and for sole practitioners are based on the suggested arrangements for handling complaints set out in the above guidance. Chambers or sole practitioners may decide to adopt the model procedure but are free to develop their own procedure or set of rules for dealing with complaints. Chambers must ensure that any procedure they develop is compliant with the mandatory requirements set out at Section D1 of the Code of Conduct in the BSB Handbook, and the requirements of the Alternative Dispute Resolution for Consumer Disputes (Amendment) Regulations 2015 in respect of informing clients about ADR.

These models will also be useful for BSB entities – they can make the necessary changes applicable to their organisation.

Appendix 1

Model chambers complaints procedure for multi-member sets

1. Our aim is to give you a good service at all times. However, if you have a complaint you are invited to let us know as soon as possible. It is not necessary to involve solicitors in order to make your complaint, but you are free to do so should you wish.

2. Please be assured that any complaints made will be taken seriously and handled with care and will not disadvantage your case or matter. We will investigate and handle complaints in a fair and consistent manner, diligently and impartially, and seek to respond and resolve your complaint promptly.

3. Please note that the Legal Ombudsman, the independent complaints body for service complaints about lawyers, has time limits in which a complaint must be raised with them. From 1 April 2023, the time limits are:

a) The complainant must refer the complaint to the Legal Ombudsman no later than one year from the act/omission, or one year from when the complainant should reasonably have known there was cause for complaint.

b) The complainant must also refer the complaint to the Legal Ombudsman within six months of the complaint receiving a final response from their lawyer, if that response complies with the requirements in rule 4.4 of the Scheme Rules (which requires the response to include prominently an explanation that the Legal Ombudsman was available if the complainant remained dissatisfied, and the provision of full contact details for the Ombudsman and a warning that the complaint must be referred to them within six months).

4. Chambers must have regard to that timeframe when deciding whether they are able to investigate your complaint. Chambers will not therefore usually deal with complaints that fall outside of the Legal Ombudsman's time limits. The Ombudsman can extend the time limit in exceptional circumstances.

5. The Ombudsman will also only deal with complaints from consumers. This means that only complaints from the barrister's client are within their jurisdiction. Non-clients who do not fall within the jurisdiction of the Ombudsman who are not satisfied with the outcome of the Chambers' investigation should contact the BSB rather than the Legal Ombudsman.

6. It should be noted that it may not always be possible to investigate a complaint brought by a non-client. This is because the ability of chambers to satisfactorily investigate and resolve such matters is limited and complaints of this nature are often better suited to the disciplinary processes maintained by the BSB. Therefore, chambers will make an initial assessment of the complaint and if they feel that the issues raised cannot be satisfactorily resolved through the chambers complaints process they will refer you to the BSB.

Complaints made by telephone/video call/other formats

7. You may wish to make a complaint in writing and, if so, please follow the procedure in paragraph 10 below. If you would like to make your complaint in other ways or formats, or accessible options, please do not hesitate to contact us so that we can best accommodate your needs.

8. However, if you would rather speak initially on the telephone, video call, or other format that suits your preference and information needs, about your complaint, then please engage the individual nominated under the chambers complaints procedure to deal with complaints [NAME] or (if the complaint is about a member of staff) the [senior member of staff - NAME]. If the complaint is about the [senior member of staff] telephone/other contact details/email (to arrange video calls) [the Head of Chambers - NAME or other member of Chambers

appointed by head]. The person you contact will make a note of the details of your complaint and what you would like to have done about it. They will discuss your concerns with you and aim to resolve them. If the matter is resolved they will record the outcome, check that you are satisfied with the outcome and record that you are satisfied. You may also wish to record the outcome of the telephone discussion in writing.

9. If your complaint is not resolved at this stage, you will be invited to write to us about it, so it can be investigated formally. At this stage, we will also check if you would like to engage with us on accessible formats, to meet your specific information and communication needs. We will discuss and agree with you the best way and format for us to engage and communicate together. We will advise you on the best way to set out your concerns and complaint for the next formal investigation stage, depending on your needs and preferences.

Complaints Made in Writing and in other Accessible Formats

10. For complaints made in writing, please give the following details:

- Your name and address;
- Which member(s) of chambers you are complaining about;
- The detail of the complaint; and
- What you would like done about it.

11. Please address your letter/correspondence to [name of preferred recipient and chambers' address/email address]. We will, where possible, acknowledge receipt of your complaint within two days and provide you with details of how your complaint will be dealt with.

12. For complaints made in other accessible formats, we will discuss and advise you on the best way to set out your concerns, tailored to your needs, and how to provide the information above in paragraph 10.

13. Our chambers has a panel headed by [name] and made up of experienced members of chambers and a senior member of staff, which considers any written and formal complaint. Within 14 days of your letter/formal complaint being received the head of the panel (or their deputy in their absence) will appoint a member of the panel to investigate it. If your complaint is against the head of the panel, the next most senior member of the panel will investigate it. In any case, the person appointed will be someone other than the person you are complaining about.

14. The person appointed to investigate will write to you as soon as possible to let you know they have been appointed and that they will reply to your complaint within 14 days. If they find later that they are not going to be able to reply within 14 days they will set a new date for their reply and inform you. In any event, we will keep you informed and provide regular updates on progress of the complaint investigation. Their reply will set out:

- The nature and scope of their investigation;
- Their conclusion on each complaint and the basis for their conclusion; and
- If they find that you are justified in your complaint, their proposals for resolving the complaint.

Confidentiality

15. All conversations and documents relating to the complaint will be treated as confidential and will be disclosed only to the extent that is necessary. Disclosure will be to the Head of Chambers, members of our management committee and to anyone involved in the complaint and its investigation. Such people will include the barrister member or staff who

you have complained about, the head or relevant senior member of the panel and the person who investigates the complaint. The BSB is entitled to inspect the documents and seek information about the complaint when discharging its monitoring functions.

Our policy

16. As part of our commitment to client care we make a written record of any complaint and retain all documents and correspondence generated by the complaint for a period of six years. Our management committee inspects an anonymised record regularly with a view to improving services. From time to time, a summary of the complaint will be provided to the Bar Standards Board, on an anonymous basis, which will only provide information about what the complaint was about, and the outcomes.

Complaints to the Legal Ombudsman

17. If you are unhappy with the outcome of our investigation and you fall within their jurisdiction you may take up your complaint with the Legal Ombudsman, the independent complaints body for complaints about lawyers, at the conclusion of our consideration of your complaint. The Ombudsman is not able to consider your complaint until it has first been investigated by chambers, or if the complaint has not been resolved to your satisfaction within 8 weeks of making your complaint. Please note the timeframe for referral of complaints to the Ombudsman as set out at paragraph 2 above. Those clients who are able to complain to the Legal Ombudsman are as follows:

a) Individuals;

b) Businesses or enterprises that are micro-enterprises within the meaning of Article 1 and Article 2(1) and (3) of the Annex to Commission Recommendation 2003/361/EC (broadly businesses or enterprises with fewer than 10 employees and turnover or assets not exceeding €2 million);

c) Charities with an annual income net of tax of less than £1 million;

- d) Clubs, associations or organisations, the affairs of which are managed by its members or a committee of its members, with an annual income net of tax of less than £1 million;*
- e) Trustees of trusts with an asset value of less than £1 million; and*
- f) Personal representatives or beneficiaries of the estates of persons who, before they died, had not referred the complaint to the Legal Ombudsman.*

You can write to the Legal Ombudsman at:

*Legal Ombudsman
PO Box 6167
Slough
SL1 0EH*

Telephone number: 0300 555 0333

Email: enquiries@legalombudsman.org.uk

More information about the Legal Ombudsman is available on their website:

<http://www.legalombudsman.org.uk/>

If you are unhappy with the outcome of the investigation, alternative complaints bodies as approved by the Chartered Trading Standards Institute (<https://www.tradingstandards.uk/consumer-help/adr-approved-bodies/>) also exist which are competent to deal with complaints about legal services, should you and the barrister both wish to use such a scheme. If you wish to use your chosen ADR provider, please contact us to discuss this, including time limits for contacting your chosen ADR. Please also note that if mediation is used, neither you nor the barrister is required to accept the proposed resolution. If mediation does not resolve the complaint, you may still make a complaint to the Legal Ombudsman (provided you fall within their jurisdiction and you do so within the time limit)

18. If you are not the barrister's client and are unhappy with the outcome of our investigation then please contact the Bar Standards Board at:

Bar Standards Board
Contact and Assessment Team
289-293 High Holborn
London
WC1V 7JZ

Telephone number: 0207 6111 444

Website: www.barstandardsboard.org.uk

Appendix 2

Model complaints procedure - sole practitioners

1. My aim is to give all my clients a good service at all times. However, if you have a complaint please let me know as soon as possible. I will treat your complaint as confidential although I may discuss it with other barristers or officials from the Bar Standards Board as part of their monitoring functions. I will not reveal your name to others unless I appoint an independent person to investigate a complaint or set up mediation. I will deal with your complaint promptly.

2. Please be assured that any complaints made will be taken seriously and handled with care and will not disadvantage your case or matter. I will investigate and handle complaints in a fair and consistent manner, diligently and impartially, and seek to respond and resolve your complaint promptly.

3. Please note that the Legal Ombudsman, the independent complaints body for service complaints about lawyers, has time limits in which a complaint must be raised with them. From 1 April 2023, the time limits are:

- a) The complainant must refer the complaint to the Legal Ombudsman no later than one year from the act/omission, or one year from when the complainant should reasonably have known there was cause for complaint.
- b) The complainant must also refer the complaint to the Legal Ombudsman within six months of the complaint receiving a final response from their lawyer, if that response complies with the requirements in rule 4.4 of the Scheme Rules (which requires the response to include prominently an explanation that the Legal Ombudsman was available if the complainant remained dissatisfied, and the provision of full contact details for the Ombudsman and a warning that the complaint must be referred to them within six months).

4. I must have regard to that timeframe when deciding whether I am able to investigate your complaint. I will not therefore usually deal with complaints that fall outside of the Legal Ombudsman's time limits. The Ombudsman can extend the time limit in exceptional circumstances.

5. The Ombudsman will also only deal with complaints from consumers. This means that only complaints from the barrister's client are within their jurisdiction. Non-clients who are not satisfied with the outcome of the investigation should contact the Bar Standards Board rather than the Legal Ombudsman.

6. It should be noted that it may not always be possible to investigate a complaint brought by a non-client. This is because my ability to satisfactorily investigate and resolve such matters is limited and complaints of this nature are often better suited to the disciplinary processes maintained by the Bar Standards Board. Therefore, I will make an initial assessment of the complaint and if I feel that the issues raised cannot be satisfactorily resolved through my complaints process I will refer you to the Bar Standards Board.

Complaints made by telephone/video call/other formats

7. If you wish to make a complaint by telephone, or video call, I will make a note of the details of your complaint and what you would like done about it. I will endeavour to resolve matters with you at this stage. If after discussion you are satisfied with the outcome I will make a note of the outcome and the fact that you are satisfied. If you are not satisfied you may wish to make a written complaint. If you would like to make discuss your complaint in other ways or formats, or accessible options, please do not hesitate to contact me so that I can best accommodate your needs.

Complaints made in writing in other Accessible Formats

8. If you wish to make a written complaint please give me the following details:

- Your name, telephone number and address, and other relevant contact details (and your preferred method of communication);
- The detail of your complaint; and
- What you would like done about it.

9. For complaints made in other accessible formats, I will discuss and advise you on the best way to set out your concerns, tailored to your needs, and how to provide the information above in paragraph 7.

Procedure for dealing with your complaint

10. There are a number of ways in which your complaint may be dealt with:

- (a) Discussion over the telephone, video call (or other alternative accessible formats);
- (b) Dealt with by correspondence and other accessible formats;
- (c) Discussion at a meeting between us;
- (d) The appointment of an independent person to investigate the complaint.

11. If we decide to appoint an independent person to investigate the complaint (for example, a barrister in another chambers), we both would need to agree who to appoint. An independent person who has considerable experience in the area that is the subject matter of the dispute should be chosen.

12. Upon receipt of a written complaint I will:

- (a) Reply in writing or in the agreed format, normally within 48 hours, to acknowledge the complaint and inform you how I shall be dealing with it.

(b) Reply within 14 days responding in full to your complaint. I will offer you the opportunity to meet with you if that is appropriate. If I find later that I am not going to be able to reply within 14 days I will set a new date for my reply and inform you. My reply will set out:

- The nature and scope of my investigation;
- My conclusion on each complaint and the basis for my conclusion; and
- If I find that you are justified in your complaint, my proposals for resolving the complaint.

13. If you are not happy with my final written response and you fall within their jurisdiction, or if the complaint has not been resolved to your satisfaction within 8 weeks of making your complaint, you may make a formal complaint to the Legal Ombudsman, the independent complaints handling body for complaints about lawyers. Please note the timeframe for referral of complaints to the Ombudsman as set out at paragraph 2 above. Those clients who are able to complain to the Legal Ombudsman are as follows:

a) Individuals;

b) Businesses or enterprises that are micro-enterprises within the meaning of Article 1 and Article 2(1) and (3) of the Annex to Commission Recommendation 2003/361/EC (broadly businesses or enterprises with fewer than 10 employees and turnover or assets not exceeding €2 million);

c) Charities with an annual income net of tax of less than £1 million;

d) Clubs, associations or organisations, the affairs of which are managed by its members or a committee of its members, with an annual income net of tax of less than £1 million;

e) Trustees of trusts with an asset value of less than £1 million; and

f) Personal representatives or beneficiaries of the estates of persons who, before they died, had not referred the complaint to the Legal Ombudsman.

You can write to the Legal Ombudsman at:

Legal Ombudsman

PO Box 6167

Slough

SL1 0EH

Telephone number: 0300 555 0333

Email: enquiries@legalombudsman.org.uk

More information about the Legal Ombudsman is available on their website:

<http://www.legalombudsman.org.uk/>

If you are unhappy with my final written response, alternative complaints bodies as approved by the Chartered Trading Standards Institute (<https://www.tradingstandards.uk/consumer-help/adr-approved-bodies/>) also exist which are competent to deal with complaints about legal services, should we both wish to use such a scheme. If you wish to use an alternative complaint body please contact me to discuss this, including timelines for raising a complaint. Please also note if we use mediation, neither you nor I am required to accept the proposed resolution. If mediation does not resolve the complaint, you may still make a complaint to the Legal Ombudsman (provided you fall within their jurisdiction and you do so within the time limit).

14. If you are not my client and are unhappy with the outcome of our investigation then please contact the Bar Standards Board at:

Bar Standards Board

Contact and Assessment Team

289-293 High Holborn

London

WC1V 7JZ

Telephone number: 0207 6111 444

Website: www.barstandardsboard.org.uk

15. I will maintain confidentiality at all times and discuss your complaint only to the extent that is necessary for its resolution and to comply with requests for information from the Bar Standards Board discharging its monitoring functions.

16. I will retain all correspondence and other documents generated in the course of your complaint for a period of six years and I will review complaints at least once a year to ensure that I maintain good standards of service. From time to time, a summary of the complaint will be provided to the Bar Standards Board, on an anonymous basis, which will only provide information about what the complaint was about, and the outcomes.