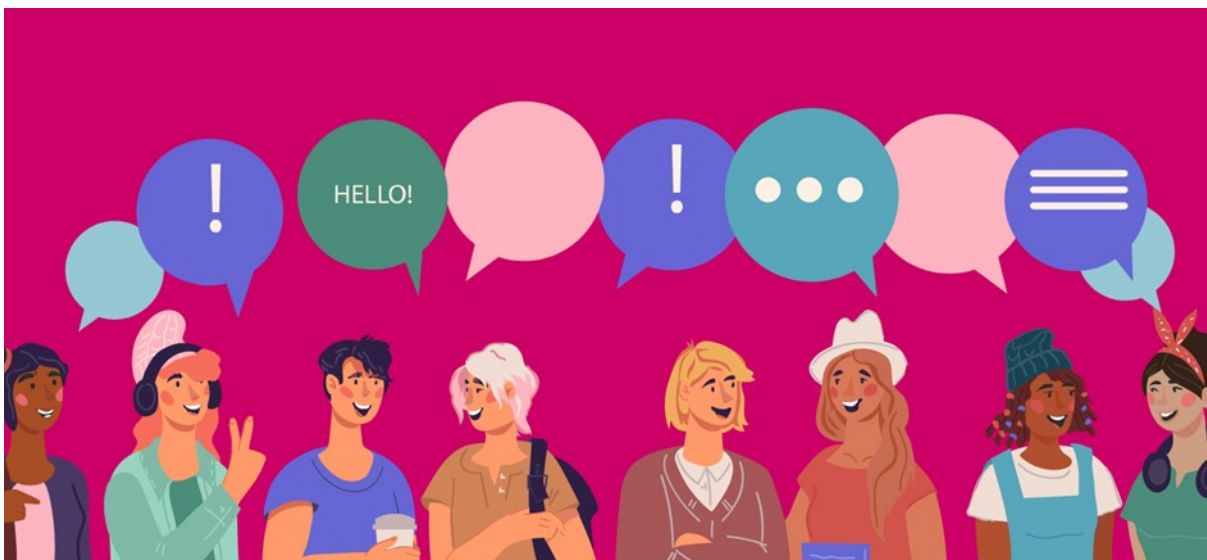


Who makes complaints to the SLCC?



About the SLCC Consumer Panel

The SLCC Consumer Panel is an independent advisory panel set up to assist the SLCC in understanding and taking account of the interests of consumers of legal services.

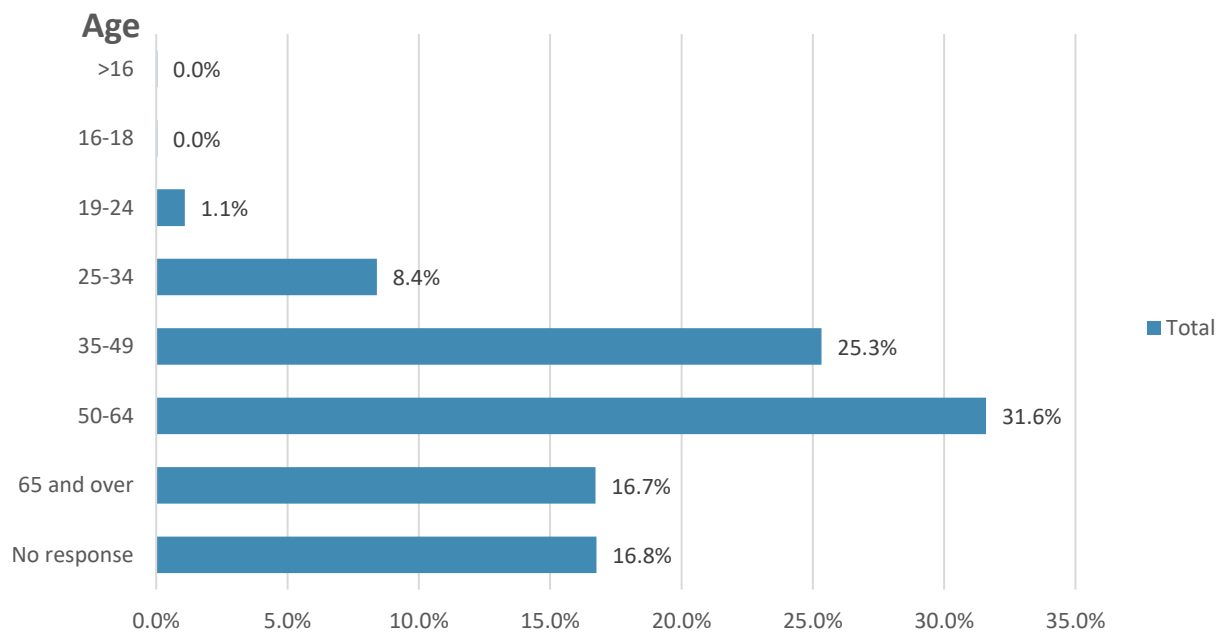
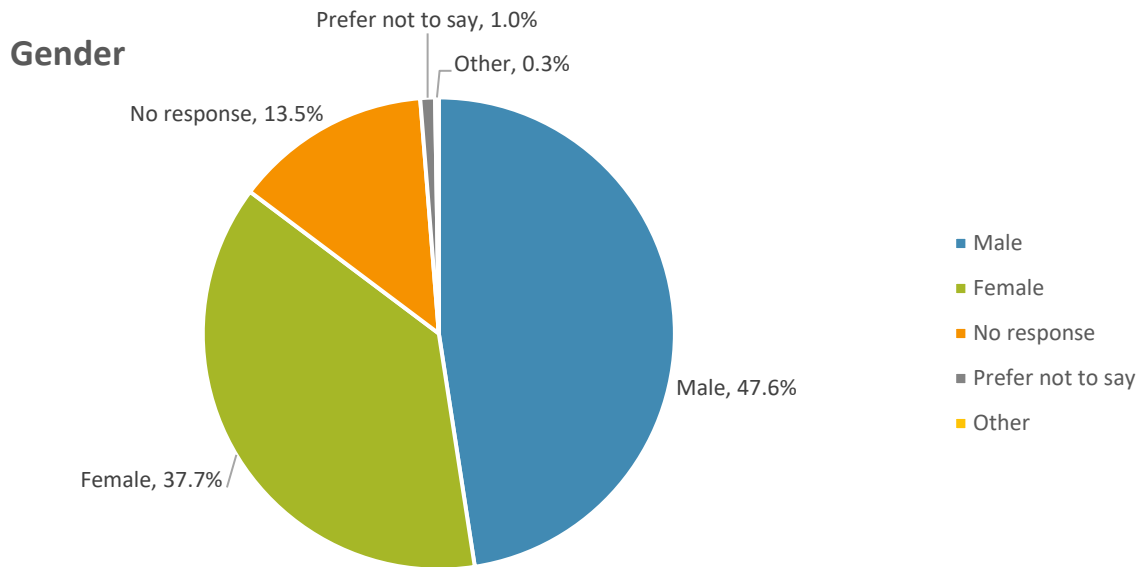
The Panel has a keen interest in ensuring that everyone who uses legal services is aware of their right to complain about that service and has access to the SLCC's complaints process.

We want to know whether there are groups more or less likely to use the SLCC's services, as this may indicate groups of people who are under-represented. We do this by looking at the anonymous demographic data collected by the SLCC when someone makes a complaint. This includes data on complainers' age, gender and ethnic background, as well as whether they have a disability.

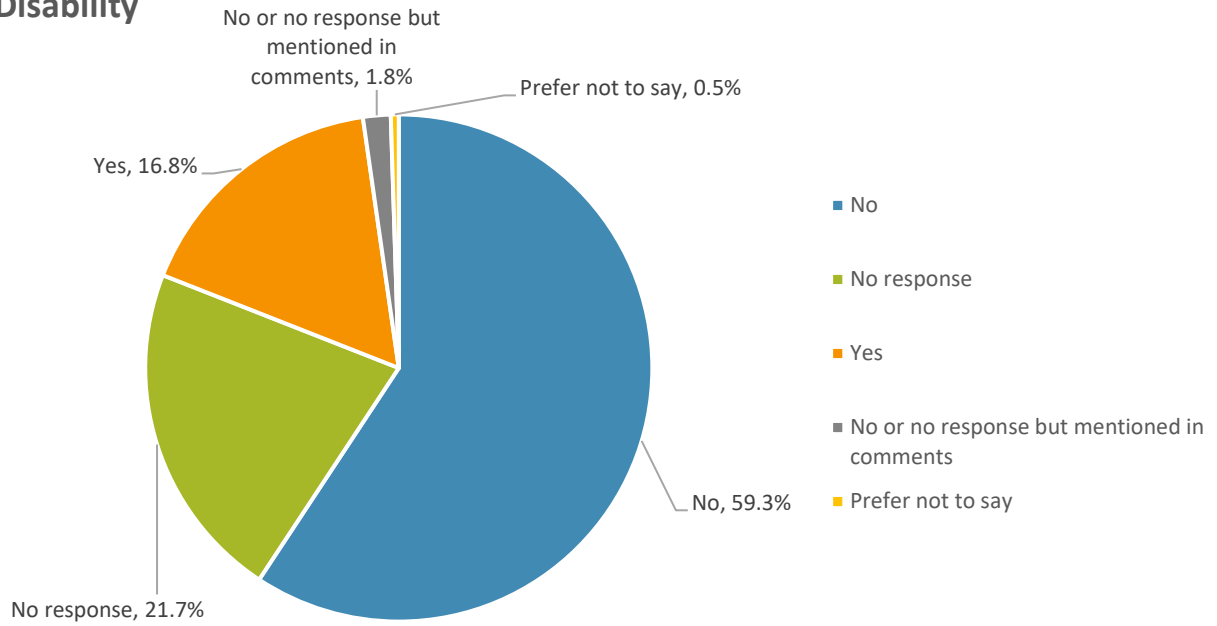
Not everyone chooses to respond and not all of those who do respond answer every question, which means we must be cautious with any findings. However, this information helps us understand whether there are groups who may be less likely to make complaints, and to consider what could create barriers for those groups. This enables us to work with the SLCC to ensure its services are accessible to everyone.

The information collected relates to the period between 1 July 2022 - 30 June 2024. It includes 2381 individual responses (although not everyone will have responded to every question). Detail on non-responses to individual questions is included for completeness.

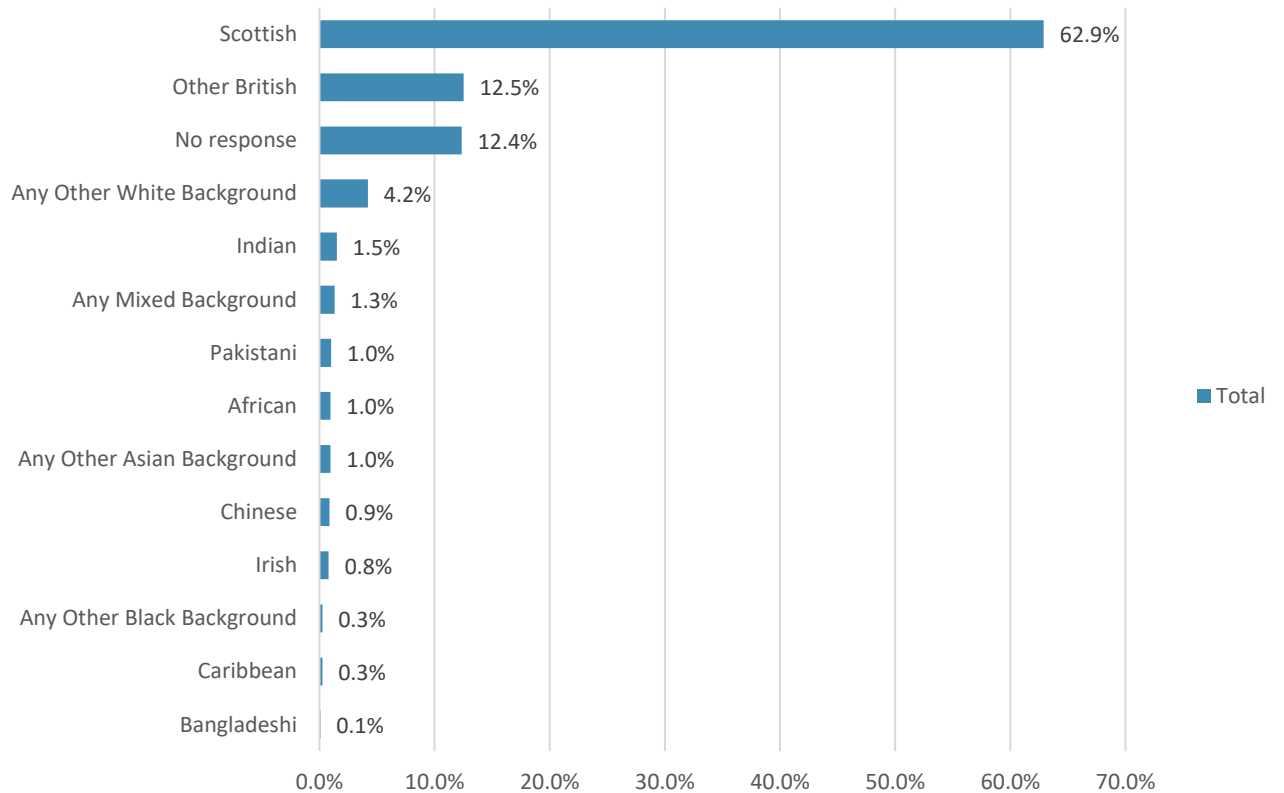
Who makes complaints about legal services?



Disability



Ethnic Group



How does that compare to the general population and people using legal services? And what are the key changes over time?

As far as possible using publicly available data, we have sought to compare this data to population data for Scotland (using the [Scottish Household Survey](#)) and available data on legal services users.

There is no standard dataset which shows who uses legal services in Scotland. However, data from sources such as the [Scottish Crime and Justice Survey](#), or the [Scottish Legal Aid Board's legal aid applicant equality data](#) can give some indication of likely demographics within some groups of legal service users. The recently published [Consumer Scotland survey, Using Legal Services in Scotland](#) provides a helpful breakdown of consumer use of legal services across different demographics.

These sources give a useful indication of the extent to which certain groups of legal service users may compare to the wider Scottish population and to those who make complaints to the SLCC.

We have also considered how the data compares to previous years to see if we can see any trends or changes emerging.

It is difficult to draw firm conclusions from some of the data, and there are many people who choose not to answer these questions when asked by the SLCC. That means these findings should be treated with caution. However, subject to those caveats (and excluding non-responses), we can see that:

Gender

- There are fewer women complaining to the SLCC than might be expected from the population split (49% men: 51% women) and available data on the use of legal services. This is broadly similar to the data we reported in 2022.
- This is consistent with previous years' data suggesting this is a trend for the SLCC. Complaints may be made in joint names (e.g. couples, family members), so this may be a contributing factor if more men than women complete these questions.
- There is no clear indication from the available data that overall either men or women are more likely to use legal services (although there are some differences in the type of legal services most commonly used). The data from Consumer Scotland suggests an equal proportion of men and women access legal services.

Age

- Proportionally fewer young people (those under 16s and 16-24 year olds) complained to the SLCC than might be expected based on the population split and the number of children and young people who apply for legal aid (17% of the population were under 16 and 11% aged 16-24). This is broadly similar to the data we reported in 2022.
- However, this is consistent with the relatively higher number of complaints made to the SLCC about legal transactions such as conveyancing.
- The available data suggests that children and young people do access legal services, albeit in smaller numbers than older adults. This is especially clear in the demographic data on applications for legal aid and in the Consumer Scotland data.
- We also know from our ombudsman colleagues that children and young people are generally less likely to make complaints about any type of services.

Disability

- After our last report in 2022 the SLCC revised its data collection on disability to capture cases where people did not report having a disability but then mentioned a limiting long-term health condition in their comments. This means data are not directly comparable with previous years.
- Fewer people who said they had a disability complained to the SLCC than the percentage of the population who reported having a limiting long-term health condition (just under a quarter of adults in Scotland).
- This may be due to the differently worded questions used by different surveys, due to underreporting (a higher proportion of respondents did not respond to this question), or could reflect barriers to engagement with the SLCC.
- The available data suggests that people with a disability were more likely to experience civil law problems than the general population. The Consumer Scotland data suggests that around 30% of those who said they'd used legal services in the past two years reported having a disability or limiting long-term health condition.

Ethnicity

- The ethnicity profile of complainers broadly corresponds with ethnicity figures from the Scottish Household Survey. This is broadly similar to the data we reported in 2022.
- There is limited evidence on the ethnicity profile of legal services users that we have found to use as a point of comparison, but the Consumer Scotland survey suggests that around 4% of those who had used legal services in the past two years were from a Black, Asian or minority ethnic background, broadly in line with the population and the ethnicity profile of complainers.

Our recommendations

In considering this data the SLCC Consumer Panel has identified a number of actions which could be taken to address the findings. Some of these were raised in our last publication in 2022. Work is already underway in some areas and we want to see this continue. In some areas we have seen less progress, and we hope to see this prioritised in the coming year.

Action since the 2022 report:

1. The SLCC has updated its diversity monitoring questionnaire. We hope this will:
 - a. encourage people to feel confident in completing the questionnaire
 - b. make data as comparable as possible with other sources of publicly available equalities data
 - c. ensure that future analysis will bring greater insight.
2. The SLCC has discussed the findings of the report at all staff meetings to consider potential barriers and improvements which could affect the ability of particular groups to be confident in accessing the SLCC's services. One area identified was that rich data collected through these returns is collected confidentially and held separately to complaints data. In the case of disability information that means people are sometimes disclosing important information that may help the team to ensure their needs are met, including providing reasonable adjustments, but that isn't linked to their individual complaint.

The SLCC's Service Experience Team has recently updated the wording in the complaint form and the initial letters sent to complainers to encourage people to highlight any needs they might have or adjustments they might require. This will balance safeguarding this protected data with supporting accessibility and providing good customer service.

3. The SLCC and Consumer Panel have discussed child-friendly complaints and agreed a way forward to implement this. This work is now underway.
4. The Consumer Panel has sought to expand its membership, in particular from groups working with or representing people with disabilities or minority ethnic communities, but has not yet been able to secure this, mainly due to challenging financial and capacity issues within the third sector.

Recommendations:

1. The SLCC should continue to discuss these findings and use them as a tool for insight and improvement.
2. The SLCC should take any action available to it in order to create a positive culture of complaints as a source of useful feedback within the legal services sector, and to support and encourage reluctant complainers to come forward.

3. The SLCC should finalise and implement its approach on child-friendly complaints.
4. The SLCC and Consumer Panel should seek advice and good practice from groups working with or representing people with disabilities and minority ethnic communities to understand if there are potential barriers to making complaints and if so, consider how to make the complaints process more accessible.

Securing members from these groups is a key goal for the Panel, but in the interim, alternative approaches to bringing in insight (for example, a session focused on particular groups and their needs and experiences) could be considered.

5. The SLCC should seek and identify useful comparisons with other complaints bodies, ombudsmen etc. to benchmark its performance and identify any further actions that could aid improvement.