

# High-volume consumer claims

Updated 8 October 2025

We, and others, are increasingly concerned about how the market for high-volume consumer claims is operating, and that this is leading to consumers facing harm.

When it works well, the high-volume claims model can be a good route for consumers to enforce their rights. As the regulator of solicitors and law firms, we have a role to play in ensuring our rules are working to protect the public, and that the standards we set are being consistently met by those we regulate.

Tackling issues in the high-volume consumer claims sector is not something we can do in isolation. The issues are complex and cut across multiple sectors and regulatory regimes, which is why we are also actively working with other stakeholders to address these challenges.

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## **What are high-volume consumer claims?**

High-volume consumer claims arise when large numbers of consumers file claims against the same organisation, or in relation to the same issue. Such claims activity is currently concentrated in areas including housing disrepair, data breaches, flight delays, diesel car emissions, motor finance commission, and other financial services.

In some cases, the public can pursue such claims directly through free to access compensation schemes, but in many cases making a claim can involve claimants instructing a law firm or claims management company (CMC) to represent them.

Law firms and CMCs often market such action as being pursued on a 'no-win, no-fee' basis.

## **Why are we concerned?**

When it works well, the high-volume consumer claims sector can provide an effective route for consumers to enforce their rights.

But we, and others, are growing increasingly concerned about issues relating to both how the market operates generally, and the behaviours and practices of some law firms and CMCs. We are concerned that a significant number of those operating in the sector may not be fulfilling their obligations to always act in their clients best interests and follow all the relevant rules and regulations.



This is not only leading to individual consumers facing harm but also has the potential to undermine public trust in the legal profession.

Over recent years, we have also seen a number of high-profile cases of firms specialising in high-volume claims work failing, for example, the collapse of [SSB Law Ltd](https://upgrade.sra.org.uk/news/news/cavity-ssb-group/) [<https://upgrade.sra.org.uk/news/news/cavity-ssb-group/>].

Common areas of concern emerging from our work in this area include:

- How clients are acquired and onboarded, and how referral arrangements work.
- Potential failings in how the 'no-win no-fee' market works, particularly regarding arrangements that should protect consumers from financial liability should a claim fail.
- A lack of transparency around fees, costs, and how firms manage claims day-to-day.
- How firms fund claims work, and implications for clients.

## **SSB Law Ltd**

At the end of 2023, we received a number of reports that clients of SSB were unexpectedly being pursued to pay adverse legal costs in relation to discontinued cavity wall insulation litigation claims. This was despite clients having entered into the claims on a 'no-win no-fee' basis.

This case highlighted concerning potential issues with how such arrangements work in practice, in particular where they involve after the event (ATE) insurance.

The collapse also led to significant delays and challenges for clients with ongoing claims, whose cases needed to be transferred to other solicitors in order to be progressed.

We have [published information to help former clients of SSB](https://upgrade.sra.org.uk/news/news/information-former-clients-ssb/) [<https://upgrade.sra.org.uk/news/news/information-former-clients-ssb/>] understand their options and, following our intervention into the firm, [continue to investigate and take disciplinary action](https://upgrade.sra.org.uk/news/news/cavity-ssb-group/) [<https://upgrade.sra.org.uk/news/news/cavity-ssb-group/>] against regulated individuals involved with the firm.

## **What are we doing?**

Addressing issues regarding how the high-volume claims industry is functioning is a key priority area for us. We are committed to delivering a targeted and robust programme of work to protect consumers and hold firms to account.

This programme is multi-faceted and involves a wide range of activity across areas such as:



- Investigating potential wrong-doing and taking enforcement action.
- Identifying and understanding issues and themes across the sector.
- Working with other key regulators such as the FCA, which regulates CMCs.
- Reviewing and developing our rules and approaches.
- Sharing best practice advice, warning of the risks involved and guidance with the public and profession.
- Current and future policy development.
- Working with government and wider stakeholders to consider long-term issues and changes to how the market operates.

## **Investigations**

As of 31 July 2025, we have 95 open investigations relating to 76 firms that manage high-volume consumer claims. Between them these firms are handling hundreds of thousands of claims.

## **Discussion paper**

We have launched a [discussion paper](https://upgrade.sra.org.uk/sra/consultations/discussion-papers/high-volume-consumer-claims-market-consumers/) [https://upgrade.sra.org.uk/sra/consultations/discussion-papers/high-volume-consumer-claims-market-consumers/], calling for views on the challenges facing consumers that join high-volume claims. As part of this we have identified five main challenges with the way the sector is operating. Insights gained from the discussion paper will inform future action we will take in using our regulatory powers to support the creation of a safer claims market for consumers. Feedback on the challenges and questions raised in the paper is requested before 14 November 2025.

## **Thematic review**

We have published a [high-volume claims thematic review \(August 2025\)](https://upgrade.sra.org.uk/sra/research-publications/high-volume-consumer-claims-thematic-review/) [https://upgrade.sra.org.uk/sra/research-publications/high-volume-consumer-claims-thematic-review/], which sets out our analysis of day-to-day practices and approaches employed by law firms operating in this market. You can also [read our summary report](https://publications.sra.org.uk/high-volume-consumer-claims-thematic-review/) [https://publications.sra.org.uk/high-volume-consumer-claims-thematic-review/].

The review identifies a range of both good and poor practice, as well as providing useful resources to help law firms in complying with our rules and ensuring they are acting in the best of interests of their clients.

## **Law firm declaration**

We have written to firms active in the high-volume consumer claims sector, sharing the concerns we've outlined in the thematic review. Firms must complete a mandatory declaration confirming they are compliant



with our relevant rules and obligations. Where we see poor practice, we will take robust action against those firms.

[Declaration exercise and our Q&As](https://upgrade.sra.org.uk/home/hot-topics/high-volume-consumer-claims/q-a-high-volume-claims-declaration/) [<https://upgrade.sra.org.uk/home/hot-topics/high-volume-consumer-claims/q-a-high-volume-claims-declaration/>].

## **Consumer research**

We have commissioned new research looking at consumers' experiences when engaging with law firms to make a claim. The research will examine areas such as how claims are initiated, how they are marketed, consumers' awareness of their rights and how claims progress, and what influences positive or negative consumer experiences.

The findings from this research will help us to better understand consumers' experiences as we consider our future plans and policies.

## **Motor finance commission claims**

A Supreme Court ruling on 1 August 2025 on motor vehicle commission claims decided that, in certain specific circumstances, motor finance companies may have entered unfair relationships with consumers, meaning that commission will be repayable.

Ahead of the ruling, we issued a [joint press statement](https://upgrade.sra.org.uk/news/news/press/car-finance-warning-july-2025/) [<https://upgrade.sra.org.uk/news/news/press/car-finance-warning-july-2025/>], alongside the FCA, outlining our expectations for how law firms and CMCs should handle both ongoing and potentially new approaches from the public to progress claims on their behalf.

Following the Supreme Court's decision, we issued a [further statement](https://upgrade.sra.org.uk/news/news/motor-finance-commission-claims/) [<https://upgrade.sra.org.uk/news/news/motor-finance-commission-claims/>] outlining our expectations in full. This statement outlines how we expect law firms to act in their client's best interests, including informing clients of the realistic prospect of an FCA-led redress scheme being introduced.

On 7 October the [FCA published a consultation on an industry-wide scheme to compensate motor finance customers](https://www.fca.org.uk/publications/consultation-papers/cp25-27-motor-finance-consumer-redress-scheme) [<https://www.fca.org.uk/publications/consultation-papers/cp25-27-motor-finance-consumer-redress-scheme>] who were treated unfairly between 2007 and 2024. The consultation is open until 18 November 2025. The FCA is also consulting on extending the deadline for firms to send a response to certain motor finance complaints. This consultation will close on 4 November 2025.

## **For law firms**

We continue to provide a range of support materials to highlight and help SRA-regulated law firms and solicitors to understand and comply with our rules as they relate to delivering high-volume claims work.



- [Guidance: Conducting claims management activity](https://upgrade.sra.org.uk/solicitors/guidance/claims-management-activity/)  
[https://upgrade.sra.org.uk/solicitors/guidance/claims-management-activity/]: Highlighting how the SRA-rules relate to how a law firm/solicitor manages consumer claims on a day-to-day basis.
- [Warning Notice: High-volume financial services claims](https://upgrade.sra.org.uk/solicitors/guidance/high-volume-financial-service-claims/)  
[https://upgrade.sra.org.uk/solicitors/guidance/high-volume-financial-service-claims/]: We highlighted our concerns and reminded firms of their regulatory responsibilities and obligations in regard to compliance with our rules regarding how claims linked to financial services and products are managed.
- [Warning Notice: Prohibited marketing practices](https://upgrade.sra.org.uk/solicitors/guidance/marketing-public/)  
[https://upgrade.sra.org.uk/solicitors/guidance/marketing-public/]: We highlighted our concerns and reminded firms, especially those engaged in high-volume consumer claims, of their regulatory responsibilities and obligations regarding prohibited marketing practices. As well as these, we also reminded them about about checks they must do to establish consent when passed clients from third parties.

### **Wider guidance we have issued includes:**

- [Claims management activity](https://upgrade.sra.org.uk/solicitors/guidance/claims-management-activity/)  
[https://upgrade.sra.org.uk/solicitors/guidance/claims-management-activity/]
- [Representing clients during claims for financial services or products](https://upgrade.sra.org.uk/solicitors/guidance/representing-clients-during-claims-for-financial-services-or-products/)  
[https://upgrade.sra.org.uk/solicitors/guidance/representing-clients-during-claims-for-financial-services-or-products/]
- [High volume financial service claims](https://upgrade.sra.org.uk/solicitors/guidance/high-volume-financial-service-claims/)  
[https://upgrade.sra.org.uk/solicitors/guidance/high-volume-financial-service-claims/]
- [Marketing your services to members of the public](https://upgrade.sra.org.uk/solicitors/guidance/marketing-public/)  
[https://upgrade.sra.org.uk/solicitors/guidance/marketing-public/]
- [Law firms carrying on insurance distribution activities](https://upgrade.sra.org.uk/solicitors/guidance/law-firms-carrying-insurance-distribution-activities/)  
[https://upgrade.sra.org.uk/solicitors/guidance/law-firms-carrying-insurance-distribution-activities/]
- [Publishing complaints procedure](https://upgrade.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/)  
[https://upgrade.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/]
- [Effective supervision](https://upgrade.sra.org.uk/solicitors/guidance/effective-supervision-guidance/) [https://upgrade.sra.org.uk/solicitors/guidance/effective-supervision-guidance/]
- [Conduct in disputes](https://upgrade.sra.org.uk/solicitors/guidance/conduct-disputes/) [https://upgrade.sra.org.uk/solicitors/guidance/conduct-disputes/]

## **For the public**

### **'No-win no-fee' consumer guide**

Often when people enter into a high-volume consumer claim, they do so on a 'no-win no-fee' basis. We are concerned that in many cases claimants are signing up to such agreements without fully understanding how 'no-win no-fee' arrangements work in practice, and the potential risks they may be exposed to should a claim fail.



To help people make more informed decisions before signing up to such deals, we have published an online [no-win no-fee consumer guide](https://upgrade.sra.org.uk/consumers/choosing/no-win-no-fee/) [https://upgrade.sra.org.uk/consumers/choosing/no-win-no-fee/].

As well as explaining how such arrangements work, the guide also provides checklists of tips, questions to ask, dos and don'ts and potential red flags to look out for.

Further information and resources are also available on the [Legal Choices website](https://www.legalchoices.org.uk/at-home/i-want-to-make-a-claim/no-win-no-fee/) [https://www.legalchoices.org.uk/at-home/i-want-to-make-a-claim/no-win-no-fee]

## **Guidance on motor finance commission claims**

We have [published information](https://upgrade.sra.org.uk/consumers/choosing/motor-finance-compensation-claims/) [https://upgrade.sra.org.uk/consumers/choosing/motor-finance-compensation-claims/] designed to help consumers better understand and consider their options regarding pursuing compensation claims in relation to motor finance commission arrangements.

Issues covered include:

- Implications of the August 2025 Supreme Court ruling.
- Questions to ask before engaging a law firm.
- What you should expect from a firm you are already working with.
- Your rights to exit an existing agreement.

## **Working with others**

Tackling issues in the high-volume consumer claims sector is not something we can do in isolation. As regulators of law firms and solicitors, we are taking action within our perimeters where we identify issues in the sector. These often cut across multiple sectors and regulatory regimes. As such, we are also working with other organisations that provide advice and guidance to consumers or regulate these markets to ensure these complex issues are addressed holistically.

We are actively engaging with stakeholders to inform and influence the sector, whether through joint media engagement, communication to the profession, or roundtable discussions with representation from our Chief Executive and Chair.

## **What we have said**

### **News releases**

- [SRA and FCA warn law firms and claims management companies over poor practices in motor finance commission claims](https://upgrade.sra.org.uk/news/news/press/car-finance-warning-july-2025/) [https://upgrade.sra.org.uk/news/news/press/car-finance-warning-july-2025/]



- [SRA issues warning notice on unsolicited approaches and cold calling](https://upgrade.sra.org.uk/news/news/press/2024-press-releases/warning-notice-unsolicited-approaches/) [https://upgrade.sra.org.uk/news/news/press/2024-press-releases/warning-notice-unsolicited-approaches/]
- [Warning to law firms working on financial compensation claims](https://upgrade.sra.org.uk/news/news/press/2024-press-releases/mass-claims/) [https://upgrade.sra.org.uk/news/news/press/2024-press-releases/mass-claims/]
- [Views wanted on rules to restrict excessive fee charging in financial mis-selling claims](https://upgrade.sra.org.uk/news/news/press/2023-press-releases/fee-restrictions-consultation/) [https://upgrade.sra.org.uk/news/news/press/2023-press-releases/fee-restrictions-consultation/]
- [Ombudsman report looks at personal injury issues](https://upgrade.sra.org.uk/news/news/press/2022-press-releases/ombudsman-report-looks-at-personal-injury-issues/) [https://upgrade.sra.org.uk/news/news/press/2022-press-releases/ombudsman-report-looks-at-personal-injury-issues/]

## **SRA Update articles**

- [Claims management activity, car finance and compensation schemes](https://upgrade.sra.org.uk/news/news/car-finance-compensation-schemes/) [https://upgrade.sra.org.uk/news/news/car-finance-compensation-schemes/]
- [Work continues around high-volume claims](https://upgrade.sra.org.uk/news/news/sra-update-137-high-volume-claims/) [https://upgrade.sra.org.uk/news/news/sra-update-137-high-volume-claims/]