



High-volume consumer claims

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What are high-volume consumer claims?

High-volume consumer claims (HVCC) 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 they work well, high-volume consumer claims can provide an effective route for consumers to enforce their rights, increasing access to justice and enabling consumers to pursue claims that might otherwise be out of reach. But when professional standards are not followed, we see widespread risks caused by poor practice and firm failure. These risks, including direct consumer harm and undermined trust in legal services, are amplified by the pace and scale of the HVCC sector.

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.

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 and costs, and how firms manage claims day to day
- how firms fund claims work, and implications for clients.

Our proactive approach to protecting consumers

The SRA is taking a consumer-focused approach to addressing these risks. We have closed seven firms in the HVCC sector that posed serious risks to consumers and have 94 live investigations relating to misconduct concerns involving 68 firms managing HVCCs.

We have also established a supervision function to identify and address risks earlier through enhanced engagement with HVCC firms. Our aim is to identify and tackle problematic behaviour before it leads to poor outcomes for consumers.

The SRA's approach is underpinned by our work to understand how consumers experience the HVCC sector. We have used the lens of the consumer journey to map where problems arise and carried out large-scale consumer research to understand how consumers experience the sector.

Drawing on this work, alongside our thematic review, responses to our discussion paper, stakeholder feedback, analysis of declaration data and insights from our enforcement work, we have identified seven core consumer harms:

- lack of information to make decisions
- being misled
- receiving poor-quality service from legal services providers
- financial loss
- emotional harm
- losing access to legal services
- losing trust and confidence in legal services

These harms often overlap, and some – particularly loss of trust and confidence – affect the wider public as well as individual consumers.

We are prioritising the activities that have the greatest impact, focusing on where the largest numbers of consumers are affected and where practices cause the greatest harm. By targeting issues

that arise at the outset of the consumer journey, we are also seeking to prevent other problems that arise further down the line.

Our evidence shows two areas of particular concern:

- Consumers are not always given the information they need to make informed decisions before signing up to a claim.
- There are risks to firms' stability, particularly where third-party litigation funding is involved.

Some of our interventions have followed insolvencies where firms were unable to meet liabilities to litigation funders. Disorderly closures can have a significant impact, magnified by the large number of clients affected. We are acting now to tackle these areas.

Supporting consumers to make informed choices before signing up

Improving how consumers receive and engage with information when they are thinking about signing up to a claim is central to supporting informed decision-making.

Many of the participants surveyed in our consumer research [<https://www.sra.org.uk/sra/research-publications/high-volume-consumer-claims/>] did not recall being given key information at the outset of their claim. Additionally, we heard from respondents to our discussion paper that consumers are often:

- confused about making a claim
- poorly informed or unaware of free redress routes
- unclear about the different types of costs and fees.

This increases the likelihood of poor outcomes later in the process, including unexpected costs, loss of trust in legal services, and emotional distress arising from uncertainty and poor communication. These outcomes can also discourage consumers from engaging with legal services in future.

To address these issues, we are developing and testing a range of onboarding materials, including checklists and key facts documents. We will be piloting these shortly. These materials aim to improve how consumers receive and engage with key onboarding information, and support clearer understanding of costs, risks and available options so that they can make informed choices.

We are also exploring whether including additional explanatory text alongside the use of the term 'no win, no fee' would improve understanding of the risks involved in these arrangements.

To help people make more informed decisions before signing up to these arrangements, we have also published an online no-win no-fee consumer guide [<https://www.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/>] .

If you would like to find out more information or have any questions about this work, please contact us [<https://www.sra.org.uk/contact-us/>] .

Supporting the sector to deliver better outcomes

The SRA is working to help firms comply with their obligations and minimise risks to consumers.

On 9 July, we launched a 10-week consultation [<https://www.sra.org.uk/sra/consultations/consultation-listing/protecting-consumers-third-party-funding/>] on proposals to strengthen requirements for solicitors using or arranging third-party litigation funding in consumer claims.

At the same time, we have published new guidance for solicitors and law firms [<https://www.sra.org.uk/solicitors/guidance/using-arranging-third-party-litigation-funding/>] on complying with their existing professional obligations when using or arranging third-party litigation funding.

We recognise the important role litigation funding can play in increasing access to justice, its evidence shows that some arrangements can create risks to firm stability and lead to poor outcomes for consumers. The regulator is consulting on targeted and proportionate new requirements.

Specific proposals include requirements that law firms to:

- notify the SRA when they use or arrange third-party litigation funding
- conduct and retain a risk assessment of using third-party litigation funding for consumer claims



- provide clients with a clear funding information document before they enter into a third-party funding agreement for consumer claims
- maintain independence from third-party litigation funders, act in client's best interests, and protect client confidentiality.
- produce and retain an orderly closure plan where required.

The consultation forms part of the SRA's wider programme of work to address risks in the high-volume consumer claims sector, including where claims are pursued through 'no win, no fee' funding models. The proposals are informed by evidence of consumer harm identified through responses to the SRA's 2025 discussion paper, thematic review, firm declaration exercise, large-scale consumer research and ongoing investigations.

Our work to address risks in the high-volume consumer claims sector

We are 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 including:

- 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.
- Working in partnership with the sector to address risks early
- Reviewing and developing our rules and approaches.
- Sharing best practice advice 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.

Consultation launch

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consumer claims. The consultation is open until 17 September 2026.

Investigations

As of the end of June 2026, we had 94 open investigations relating to 68 firms that manage high-volume consumer claims. Between them, these firms are handling millions of claims.

Discussion paper

Our discussion paper [<https://www.sra.org.uk/sra/consultations/discussion-papers/high-volume-consumer-claims-market-consumers/>] was open for feedback from 19 September to 14 November 2025. It called for views on the challenges facing consumers that join high-volume claims. As part of this we identified five main challenges with the way the sector operates. 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.

Thematic review

We have published a high-volume claims thematic review (August 2025) [<https://www.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/>] .

The review identifies a range of both good and poor practice, as well as providing useful resources to help law firms comply with our rules and ensure they are acting in the best 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://www.sra.org.uk/home/hot-topics/high-volume-consumer-claims/q-a-high-volume-claims-declaration/>] .

Consumer research

We have published new research [<https://www.sra.org.uk/sra/research-publications/high-volume-consumer-claims/>] looking at consumers' experiences when engaging with law firms to make a claim. This research has found that, while high-volume consumer claims can provide an important route to redress, many people experience problems or are unclear about what they have signed up to.

The findings are helping to inform how we can better protect the public and build confidence in legal services, including where claims are pursued through 'no win, no fee' funding models.

Working across the system where harms extend beyond our remit

The issues in the HVCC sector extend beyond the SRA's regulatory remit, so addressing challenges requires collaboration – particularly in areas like motor finance and housing disrepair which involve multiple regulatory regimes.

We are working in partnership with the Financial Conduct Authority (FCA), the Advertising Standards Authority (ASA), and the Information Commissioner's Office (ICO) through a joint regulatory taskforce established to proactively address harms in the motor finance claims sector.

We are also working closely with the FCA on the Claims Management Market Study, sharing data and analysis, and playing an active part in governance. This recognises the need for joined-up solutions to address areas that cut across different sectors and regulators.

We also continue to engage with Government on key issues facing the HVCC sector, including:

- engagement across housing, business and trade, and justice
- allowing for a holistic understanding of risk and strengthening our ability to improve outcomes for firms and consumers.

This, in turn, supports more effective and joined-up action.

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://www.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://www.sra.org.uk/news/news/cavity-ssb-group/>] against regulated individuals involved with the firm.

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: Claims management activity
[<https://www.sra.org.uk/solicitors/guidance/claims-management-activity/>] : updated February 2026: Highlighting how the SRA rules relate to how a law firm or solicitor manages consumer claims on a day-to-day basis.
- Guidance: Third-party litigation funding:
[<https://www.sra.org.uk/solicitors/guidance/using-arranging-third-party-litigation-funding/>] published July 2026: Highlighting how the SRA rules relate to law firms or solicitors who use or arrange third-party litigation funding.
- Warning Notice: 'No win, no fee' and other fee arrangements in high-volume consumer claims
[<https://www.sra.org.uk/solicitors/guidance/no-win-no-fee-high-volume-consumer-claims/>] : We highlighted several concerns and reminded firms of their regulatory responsibilities and obligations around transparency with clients about fees and costs, not compromising client interests, making sure third-party referrers meet our standards, and managing 'no win, no fee' financial safeguards appropriately. We also highlighted concerns about the use of the term 'no win, no fee' in marketing materials.
- Warning Notice: High-volume financial services claims
[<https://www.sra.org.uk/solicitors/guidance/high-volume-financial-service-claims/>] : We highlighted our concerns and reminded firms of their regulatory responsibilities and obligations to comply with our rules



regarding how claims linked to financial services and products are managed.

- Warning Notice: Marketing your services to members of the public [<https://www.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 checks they must do to establish consent when passed clients from third parties.

Wider guidance we have issued includes:

- Representing clients during claims for financial services or products [<https://www.sra.org.uk/solicitors/guidance/representing-clients-during-claims-for-financial-services-or-products/>]
- Publishing complaints procedure [<https://www.sra.org.uk/solicitors/guidance/publishing-complaints-procedure/>]
- Effective supervision [<https://www.sra.org.uk/solicitors/guidance/effective-supervision-guidance/>]
- Conduct in disputes [<https://www.sra.org.uk/solicitors/guidance/conduct-disputes/>]

Supporting information to confirm our expectations of firms includes:

- Motor finance commission claims [<https://www.sra.org.uk/news/news/motor-finance-commission-claims/>]
- Awaab's law and housing disrepair claims [<https://www.sra.org.uk/news/news/awaabs-law/>]

For the public

Guidance on motor finance commission claims

We have published information

[<https://www.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 and 30 March 2026 FCA confirmation of a redress scheme [<https://www.fca.org.uk/news/statements/fca-confirms-motor-finance-redress-scheme>] .
- 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.

Looking ahead

A sustainable sector with the best interests of consumers at its core

The SRA is currently focusing on onboarding and third-party litigation funding, where we see the clearest opportunities to improve outcomes for consumers. But we have also identified other areas of concern, including after-the-event insurance and mass transfer of client files. We will consider further work to address concerns in these areas in due course.

As we work to improve our regulatory approach and deliver better outcomes for consumers, we expect solicitors and law firms to act with honesty and integrity, in the best interests of each client, and in a way that upholds public trust and confidence in the profession. Consistent adherence to these standards is essential to maintaining access to justice and trust in legal services.

We are committed to supporting a sector that delivers positive consumer outcomes at scale, allows firms to compete on a level playing field, and ensures that access to justice is meaningful.

What we have said

Claims management: what you need to know

Watch our session from virtual Compliance Officers Conference 2025.

News releases

- SRA consults on new proposals to strengthen requirements for solicitors using or arranging third-party litigation funding in consumer claims [<https://www.sra.org.uk/news/news/press/consults-new-proposals-consumer-claims/>]
- Research highlights risks in high-volume consumer claims sector [<https://www.sra.org.uk/news/news/press/high-volume-claims-experience-research/>]
- FCA and SRA issue joint warning to firms representing motor finance commission claims [<https://www.sra.org.uk/news/news/press/fca-sra-joint-warning-motor-finance-commission-claims/>]
- SRA issues warning notice over 'no win, no fee' practices [<https://www.sra.org.uk/news/news/press/nwnf-warning/>]



- SRA and FCA warn law firms and claims management companies over poor practices in motor finance commission claims
[<https://www.sra.org.uk/news/news/press/2025-press-releases/car-finance-warning-july-2025/>]
- SRA issues warning notice on unsolicited approaches and cold calling
[<https://www.sra.org.uk/news/news/press/2024-press-releases/warning-notice-unsolicited-approaches/>]
- Warning to law firms working on financial compensation claims
[<https://www.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://www.sra.org.uk/news/news/press/2023-press-releases/fee-restrictions-consultation/>]
- Ombudsman report looks at personal injury issues
[<https://www.sra.org.uk/news/news/press/2022-press-releases/ombudsman-report-looks-at-personal-injury-issues/>]
- FCA to review claims management practices
[<https://www.fca.org.uk/news/statements/fca-review-claims-management-practices>]

SRA Update articles

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