

An Open Letter to Paul Philip, Chief Executive of the Solicitors Regulation Authority, on His Retirement and the Unfinished Business of the SSB Investigation

From the SSB Victims Support Group

(Issued in the public interest, 27 October 2025)

To:

Paul Philip
Chief Executive, Solicitors Regulation Authority
The Cube, 199 Wharfside Street
Birmingham B1 1RN

Cc:

Anna Bradley – Chair, SRA Board
Chris Handford – Director of Regulatory Policy, SRA
Dawn Oliver – General Counsel and Executive Director of Legal and Enforcement, SRA
Aileen Armstrong – Executive Director Strategy, Innovation & External Affairs, SRA
Liz Rosser – Executive Director, Operations & Resources, SRA
Richard Orpin – Interim Chief Executive, Legal Services Board
The Rt Hon David Lammy MP – Lord Chancellor and Secretary of State for Justice

Subject: Response to the SRA's Apology Regarding the Regulation of SSB Group Limited

As the Legal Services Board's independent review into the SRA's regulation of SSB Law Group Ltd exposes systemic failure, and with Chief Executive Paul Philip retiring at the end of this week, we write publicly to ensure that the voices of those harmed are heard before the leadership of the regulator changes.

This letter was first prepared for private submission, but the victims of SSB Law have waited long enough for transparency and justice. It is issued now, openly, in the public interest.

1. The SRA's Failure Went Beyond Inaction

The independent review makes clear that the SRA did not merely fail to act - it took positive regulatory decisions which exacerbated consumer harm.

Most notably, the SRA knowingly permitted the transfer of thousands of SSB client files to another SRA-regulated firm, JMR Solicitors, despite internal warnings from its own staff that doing so would cause distress to consumers, offer no genuine protection, and risk "the shunting around of poor-quality litigation through a sequence of collapsing firms."

The report records that these internal concerns were explicitly raised yet disregarded, and that the SRA “acquiesced to this approach” in full awareness of the likely consequences. As predicted, JMR Solicitors itself collapsed in 2024, leaving already-vulnerable clients in even greater uncertainty and distress.

Crucially, the SRA’s role at that stage was not to facilitate a transfer but to intervene. It had sufficient information through its own Operation Grouse intelligence, multiple consumer reports, and knowledge of SSB’s financial instability to justify a regulatory intervention into SSB, thereby protecting clients and preserving their interests. Instead, the SRA chose to allow a file transfer motivated by financial convenience, not consumer protection. This decision represents a profound dereliction of its statutory duty to act in the public interest and safeguard consumers.

The circumstances surrounding SSB are not an anomaly. The same regulatory failings have been repeated across multiple law firms, including Tegamus Law, Pure Legal, and others involved in mass-claim and consumer-funded litigation schemes. In each instance, the SRA was alerted to patterns of consumer harm and financial instability, yet its interventions came too late or not at all.

These firms followed strikingly similar business models - acquiring high volumes of clients through aggressive marketing, outsourcing or automating case handling, and relying heavily on external litigation funding. When those models collapsed, consumers were left unprotected, and the SRA’s reactive stance allowed further harm to spread through the sector.

The Carson McDowell report makes clear that the SRA had sufficient intelligence and precedent to foresee the SSB outcome, particularly given the warnings raised during the collapses of Pure Legal and Tegamus Law. Instead of applying lessons learned or initiating early intervention, the regulator repeated the same systemic error, treating each collapse as an isolated event rather than a symptom of deeper market dysfunction.

2. Findings of the Independent Review

The independent review conducted by Carson McDowell LLP, commissioned by the Legal Services Board (LSB), sets out an unequivocal finding of regulatory failure at the highest level. It concludes that the SRA:

- Failed to comply with its statutory duty under Section 28 of the Legal Services Act 2007 to act compatibly with the regulatory objectives, including protecting and promoting the public interest and the interests of consumers.
- Did not act effectively or efficiently in response to more than 100 reports about SSB between 2019 and 2024.
- Ignored multiple warnings about the conduct, financial stability, and consumer impact of SSB, despite being in possession of sufficient intelligence to justify early regulatory intervention.
- Dismissed or downgraded legitimate reports by categorising them as service complaints rather than potential misconduct, thereby preventing proper scrutiny.

- Failed to use its investigatory powers, including the power to inspect client accounts and intervene in the firm's operations, even after internal assessments confirmed mounting consumer risk.

The report also highlights that within the SRA, staff raised explicit concerns about the decision to allow the transfer of SSB's client files to JMR Solicitors, warning that it would cause further consumer distress and undermine trust in the regulatory system. Despite this, senior management acquiesced, choosing expediency over protection.

These findings establish that the SRA's failings were not procedural oversights but systemic in nature. They reflect a regulatory culture that is reactive, fragmented, and overly influenced by financial or reputational considerations, rather than grounded in the statutory duty to uphold justice and safeguard the public.

The SSB collapse also follows a pattern previously observed across other mass-claim law firms, such as Pure Legal and Tegamus Law, where similar business models - high-volume client acquisition, reliance on litigation funding, and poor case oversight - resulted in large-scale consumer harm. While those earlier cases have not been the subject of this review, they illustrate that the risks within this sector were known and recurring, yet the regulatory framework failed to adapt or intervene effectively to prevent repetition.

3. The Continuing Impact on Victims

Thousands of former SSB clients continue to endure the consequences of both the firm's misconduct and the SRA's regulatory failings. The collapse of SSB, followed by the transfer of client files to JMR Solicitors and that firm's subsequent failure, has left many individuals without representation, facing legal cost orders, or trapped in unresolved claims.

For many, the damage extends far beyond financial loss. Families have faced court enforcement action, default judgments, and debt-recovery efforts arising from claims that should never have been pursued or were negligently managed. Victims have been left to manage spiralling liabilities, credit damage, and prolonged uncertainty - consequences that exist solely because the regulatory system failed to protect them when it had the power and evidence to do so.

The emotional and psychological toll has been profound. Members of our group report severe stress, anxiety, depression, and deteriorating health brought about by years of uncertainty and fear. Many believed that "no-win, no-fee" protection guaranteed their safety, only to discover that the very mechanisms designed to protect consumers offered no real recourse when things went wrong.

The SRA's failure to intervene, and later its decision to permit a wholesale file transfer instead of establishing protective oversight, compounded the harm. Vulnerable consumers were effectively passed from one collapsing firm to another, each time losing visibility of their case, legal rights, and ability to seek redress.

The broader social impact has also been significant. The failure of SSB and similar mass-claim firms has eroded public confidence in the legal profession, undermining trust in the integrity of "access-to-

justice” schemes that target working-class and elderly homeowners. Communities already struggling with damp, mould, and uninhabitable properties have seen their hardship deepened by the consequences of failed legal regulation.

The continuing distress of these victims stands as living evidence that the SRA’s apology cannot close this matter. Until victims are acknowledged, supported, and compensated, and until the regulator acts decisively to reform its approach, the harm remains both ongoing and unremedied.

It is only natural that trust in the SRA’s ability to carry out a fair, transparent, and robust disciplinary process has been severely eroded. Victims require reassurance that this stage of the investigation, which is still pending, will not repeat the mistakes of the past. The process must be independent, thorough, and publicly accountable, with clear communication about progress and meaningful sanctions where misconduct is proven. Anything less would represent a further failure of duty to those already wronged.

For many victims, this is not simply about professional discipline — it is about justice, recognition, and the restoration of confidence in legal regulation itself. The SRA now has an opportunity to demonstrate that it can uphold the standards it is entrusted to enforce. It must do so openly, decisively, and with full regard for the lives that have already been damaged by its earlier inaction.

The depth and persistence of the harm make it clear that words alone cannot restore trust or deliver justice. An apology, however sincerely expressed, does nothing to repair the lives already damaged or to prevent future victims from suffering the same fate. To rebuild confidence in the legal system and to demonstrate genuine accountability, the SRA must now move beyond acknowledgment to action - action that provides redress for those harmed, transparency for the public, and reform within the regulatory system itself.

4. What the Support Group Demands

The SSB Victims Support Group calls upon the SRA to demonstrate genuine accountability through immediate, transparent, and restorative action. This requires a structured response that goes beyond apology and addresses the scale of harm identified in the Legal Services Board’s independent review.

(a) Consumer Redress and Support

- Establish, in collaboration with the LSB and the Ministry of Justice, an independent compensation and redress scheme for affected SSB clients.
- Appoint a dedicated liaison officer or team within the SRA to ensure consistent communication with affected consumers and their representatives.

(b) Accountability and Transparency

- Publish a comprehensive explanation of the SRA’s decision-making process regarding the transfer of SSB’s client files to JMR Solicitors, including the rationale for not pursuing an intervention at the time.

- Confirm what disciplinary and regulatory actions are being taken against individuals and entities involved in misconduct or mismanagement of consumer cases. Provide evidence that this scope of the investigation is carried out using all relevant findings that had been previously disregarded or not fully investigated in the previous, failed investigations.
- Conduct a sector-wide review of the SRA's regulatory handling of mass-claim and consumer litigation firms, including Pure Legal, Tegamus Law, and related entities, to identify systemic weaknesses and repeated risk indicators.
- Commit to independent oversight of the implementation of the Carson McDowell recommendations, with progress reports made publicly available to Parliament and consumers.

(c) Victim Engagement, Peer Support and Oversight

- The SRA should proactively connect victims of failed law firms so they can form or join independent support groups, following the example of the SSB Victims Support Group. This network has been a lifeline for hundreds of people, offering information, mutual support, and stability to those who might otherwise have faced isolation and confusion.
- The SRA must inform all remaining SSB cavity-wall-insulation clients that our group exists, enabling them to access help, share information, and be represented collectively. Many of these victims were misled into believing that their CWI issues would be resolved through SSB's claims process. Even where professional-negligence claims succeed, the best outcome often only brings people back to zero - still living with the damp, mould, and ill health that started the cycle of harm.
- The SRA should set out a clear plan showing how lay people and consumers will be involved in reviewing and advising on investigations. This must include creating space for consumer voices in oversight panels or inquiry processes, ensuring that those affected are not merely subjects of investigation but active contributors to reform.

5. Conclusion and Next Steps

The publication of the Carson McDowell report marks a turning point. It has confirmed what victims have known for years: that the system intended to protect them instead exposed them to further harm. The SRA's apology, while acknowledged, does not constitute closure. It must be followed by visible, measurable action that restores public confidence and delivers tangible justice for those affected.

It is deeply regrettable that such a serious regulatory failure will stand as part of Paul Philip's legacy as he retires from his position as Chief Executive of the SRA. Under his leadership, the regulator had multiple opportunities to act and chose not to. The Carson McDowell report has proven that the SRA failed in its investigation of SSB, raising the serious question of how the organisation can now be considered competent to deliver justice for the victims of that failure.

The Support Group also considers the Carson McDowell report to be incomplete, not through any fault of the reviewers, but because they were constrained by the information made available to them. The process of external disciplinary enforcement directed against the solicitors and managers of SSB, relating to alleged professional misconduct and regulatory breaches, is ongoing. We expect this to be robust and made public once disciplinary proceedings are concluded. Transparency on this point is essential, with full disclosure of the evidence and internal files to the LSB, in order to begin rebuilding trust.

The SSB Victims Support Group stands ready to engage constructively with the SRA, the Legal Services Board, and the Ministry of Justice to ensure that this moment leads to meaningful reform rather than another cycle of promises and delay. We therefore invite the SRA to:

- Meet with representatives of the Support Group and the Legal Services Board to discuss the immediate steps required to address consumer harm and establish an appropriate redress mechanism.
- Set out a public timetable for implementation of the recommendations made in the Carson McDowell review, with independent oversight and accountability milestones.
- Provide a clear commitment to consumer involvement in shaping the SRA's new regulatory and investigatory practices.

This is not merely about SSB. It is about the future integrity of consumer protection in the legal system. The victims of SSB, Pure Legal, Tegamus Law, and others like them deserve to see change that prevents any repetition of their suffering.

We look forward to the SRA's response and to working together to ensure that truth leads to transformation - and that never again are vulnerable consumers left unprotected by the very system designed to defend them.

SSB Victims Support Group