

LSA Circular 10/25

22 December 2025

Dear Practitioner,

Practitioner File Review – Travel and Mileage Recoupment

This Circular will be of interest to all practitioners as it provides important updates on how the Agency intend to change their approach to Travel and Mileage (T&M) errors identified as part of the Practitioner File Review initiative.

The Legal Services Agency will recoup payments where there is not sufficient evidence on the practitioner's file to substantiate a travel and mileage claim for bills submitted on or after 1 January 2026.

1. The Practitioner File Review scheme is currently coming to the end of its third year and is part of the Agency's approach to identifying, measuring, and reducing practitioner error and fraud, as part of its overall programme of work to address the audit qualification on the Agency's statutory Annual Report and Accounts. Full details of the scheme are outlined within LSANI Guidance on our website [LSANI Guidance on practitioner file reviews](#).
2. All practitioners are required to submit accurate and timely bills and keep a record of work done as evidence.
3. As previously notified in [LSA Circular 03/24](#) and [LSA Circular 07/24](#) all payment claims submitted from 1 July 2024 onwards may be subject to fees adjustments by the Agency where an error has been identified as part of the Practitioner File Review. Failure to provide sufficient evidence may result in the Agency seeking to recoup payment.
4. A common error identified in sampled practitioner files is a lack of evidence to substantiate travel and mileage payment claims.

5. To date the Agency has applied a discretionary decision not to recoup any error associated with travel and mileage claims but have written to the individual practitioners sampled to advise in future they should supply appropriate supporting documentation.
6. A review of travel and mileage claims over the past 18 months shows that 60% of practitioners have provided satisfactory documentation to evidence their travel and mileage claim. As a large proportion of practitioners do submit adequate supporting evidence, the Agency is changing its approach to travel and mileage errors identified as part of the Practitioner File Review scheme.
7. For bills submitted from 1 January 2026 onwards, where it has been identified that there is insufficient evidence of travel and mileage on the practitioner file this will result in **recoupment**. The Agency will cease contacting the practitioner to provide them with a further chance to supply supporting documentation, instead will issue a letter notifying the practitioner of the impending recoupment.
8. Evidence produced after the original file has been submitted or after travel and mileage errors are identified by our delivery partner, the Standard Assurance Unit (SAU), will not be accepted. Practitioners will not be able to provide evidence post-error, as it is not considered contemporaneous.

Supporting Evidence

9. There is clear guidance on the provision of evidence for travel and mileage claims set out in [LSA Circular 19/23](#) which also provides a specific form developed to support payment of travel and mileage which is attached to the original request for a practitioner file.
10. The Agency recommends maintaining this [T&M log](#) to substantiate travel and mileage claims and reduce practitioner errors occurring.

Other recurring errors identified

11. Other common errors include lack of evidence for work claimed and missing records of time spent on activities such as reviewing CCTV, attending consultations, and listening/viewing of tapes. Practitioners should maintain an activity log in line with [LSANI Guidance on practitioner file reviews](#).
12. Currently the Agency writes to the individual practitioner to provide one further opportunity to provide contemporaneous evidence to validate their payment claim. This approach will continue, and the revised approach relates to travel and mileage only. However, if record keeping in relation to these other areas of error does not improve, we will look at recouping these in future also.

Correspondence from the Agency

13. The Agency's established procedure when corresponding with an individual practitioner is as follows:
 - **Initial request to provide file** – email will automatically send from donotreply@lsani.gov.uk when the sampled payment request is held.
 - **10-day reminder to provide file** – a message will issue via LAMS.
 - **21-day reminder to provide file and reports to Bar/Law Society** – a letter will issue via email from the Chief Executive from CARB@lsani.gov.uk and a copy will be uploaded to the Payment request that has been sampled for record-keeping and audit purposes.
 - **Requests for further information** – a message will issue via LAMS.
 - **To advise of the outcome of the Practitioner File Review** – a letter will be uploaded to the Payment request that has been sampled. A LAMS message will issue to inform the practitioner that a letter has been uploaded for their attention and can be viewed as a supporting document. This ensures correspondence remains linked to the relevant payment request for audit and compliance purposes.

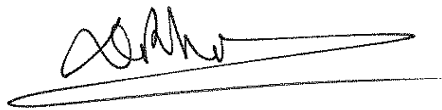
Recommendation

14. The Agency advises that practitioners should use the forms in [Annex A](#) and [Annex B](#) of circular [LSA 19/23](#) to ensure good record keeping of all items being claimed in each legal aid case. If selected for sample in future, please submit the relevant completed logs as supporting documentation.

Commencement

15. **For bills submitted on or after 1 January 2026** relating to work where travel and mileage has been claimed ***must be clearly evidenced within the practitioner file. Failure to provide sufficient evidence will result in recoupment.***

Yours faithfully,



Paul Andrews
Chief Executive