

Agenda Item	8
Report No	AC/20/25

The Highland Council

Committee: **Audit Committee**

Date: **20 August 2025**

Report Title: **Annual Complaints Performance Report – 2024/25**

Report By: **Assistant Chief Executive – Corporate**

1. Purpose/Executive Summary

- 1.1 The Council is required by the Scottish Public Services Ombudsman (SPSO) to publish its Corporate Complaints Performance annually. The SPSO publishes a list of 8 Key Performance Indicators which all Local Authorities must report to members, staff, and citizens. These requirements will be met by way of the Annual Complaints Performance Report 2024/25 which is attached as **Appendix 1** and covers the period 1st April 2024 to 31st March 2025.

In addition, the number of complaints received has been ranked by function, this information is provided at **Appendix 2** and includes comparisons with the previous two financial years.

2. Recommendations

- 2.1 Members are asked to:
- i. **Scrutinise** and **note** the performance information outlined in the Annual Complaints Report for 2024/25 at Appendix 1.
 - ii. **Agree** that the appended report will be published on the Council's website and submitted to the SPSO.
 - iii. **Note** the successful implementation of the Child Friendly Complaints Procedure in 2024/25.

3. Implications

- 3.1 Resource Implications - There are no direct resource implications arising from this report. However, the report highlights the volume of complaints, Freedom of Information requests, requests for service and general enquiries received by the Council on an annual basis and which require a response from services.
- 3.2 Legal Implications - The Council's complaint process is fully compliant with the

SPSO's statutory frontline resolution, and complex investigation complaint processes, and officers participate in benchmarking undertaken in partnership with the SPSO.

- 3.3 Risk Implications - Complaints management is a critical component of the Council's overall approach to citizen and public engagement and to achieving more efficient and effective delivery of services. The Corporate Management Team have arrangements in place via a central team, to prioritise complaints and Freedom of Information (FOI) requests and achieve statutory targets. Failure to deliver against our statutory obligations will lead to intervention by the SPSO, Scottish Information Commissioner (FOI) or Information Commissioner (Data Rights Requests).
- 3.4 Health and Safety (risks arising from changes to plant, equipment, process, or people) – There are no implications arising from this report.
- 3.5 Gaelic Implications - There are no new implications arising from this report.

4. Impacts

- 4.1 In Highland, all policies, strategies or service changes are subject to an integrated screening for impact for Equalities, Poverty and Human Rights, Children's Rights and Wellbeing, Climate Change, Islands and Mainland Rural Communities, and Data Protection. Where identified as required a full impact assessment will be undertaken.
- 4.2 Considering impacts is a core part of the decision-making process and needs to inform the decision-making process. When taking any decision, Members must give due regard to the findings of any assessment.
- 4.3 This is an update report on performance and therefore an impact assessment is not required.

5. Background and process

- 5.1 The Council follows the 2 Stage Model Complaints Handling Procedure (MCHP) laid down by the Scottish Public Services Ombudsman (SPSO), a copy of the Highland version can be found [here](#).
- 5.2 All complaints are managed centrally by the Complaints & Information Team who sit under the Legal and Corporate Governance section of the Corporate Service cluster. On receipt of a complaint the Team assess it according to the MCHP and all valid complaints are progressed.
- 5.3 Validated complaints are managed as either a Frontline response (within 5 working days for less complex complaints) or an Investigation response (within 20 working days for more complex cases). Complaints do not have to move through both stages; if on initial assessment the matters are deemed complex, they will be moved to the investigation stage and the customer will be informed accordingly.
- 5.4 Complaints can be extended at Frontline to 10 working days in exceptional circumstances. These will be recorded as not meeting the required timescales. No Frontline complaint should exceed 10 working days, but if this occurs it is escalated to an investigation complaint for oversight and signature of the relevant Chief Officer. Equally an investigation complaint can be extended past the 20-working day deadline.

- 5.5 This report focuses on how the Council manages the complaints it receives. However, many complaints received are often first requests for service, appeals, or other administrative processes, rather than complaints and are moved into the correct channel for action and the customer informed. Examples include Council Tax and Planning Appeals, or first requests for service detailing issues with potholes and/or waste issues where there is already an existing route to report these.
- 5.6 In 2024/25 there were 2,322 'complaints' submitted by customers across a variety of channels including web form, email to service staff, letter, face to face and telephone contact. An additional 589 were sent directly to the complaints@highland.gov.uk email address. Within the total (2,911) 1,236 were assessed as valid complaints, leaving 1,675 individual contacts to be signposted to the correct route for a response e.g. a request for service or appeals procedure. Each case involves careful assessment and subsequent discussion with the customer to explain the process or officer and can be both time-consuming and frustrating for the customer if they have chosen the wrong route. By way of comparison the number of contacts that had to be sign-posted elsewhere in previous years were:
- 2023/24 – 1,874 contacts
 - 2022/23 – 2,731 contacts.
- 5.7 The complaints the Council receive represent a small proportion of the recorded contact through the CRM (Customer Relationship Management) system. Customers can contact the Council via the website, telephone and walk in channels for a variety of needs such as:
- Make a Payment i.e., Council Tax, Rents
 - Report a Problem i.e., Missed Bin, Pothole or Fly-Tipping
 - Request for Service i.e., Garden Waste, Apply for Housing or Licensing
 - General Enquiry – where there is no defined process set up to meet the request of the customer this internal form is used by Customer Services.
- 5.8 In 2023/24 there were 389,423 recorded transactions in CRM. However, it is important to note that 0.3% of all recorded contact is considered a complaint.
- 5.9 It is helpful to view this contact within the context of associated requests for information which are managed by the Complaints & Information Team:
- Freedom of Information requests – 2,174 cases closed in 2024/25
 - Data Rights requests – including Subject Access Requests – 246 cases closed in 2024/25
 - MSP/MP/CEX Correspondence – 1,284 cases closed in 2024/25.
- 5.10 On 16th July 2024, the United Nation Convention on the Rights of Children (UNCRC) (Incorporation)(Scotland) Act 2024 became law and public bodies in Scotland adopted the Scottish Public Services Ombudsman's child-friendly way to handle complaints.

The Council follows the SPSO's principles which underpin how to handle and investigate complaints from or involving children, in a way that respects their rights under the UNCRC. The guidance sits alongside the principles and existing complaints handling procedure to inform best practice.

Child Friendly Complaints have added an extra step to the assessment stage of each complaint, which normally involves discussion with the service before we can allocate

the case to them. This can contribute to delays in progressing the complaint and therefore, meeting the normal timescales. Feedback has been provided to the SPSO on this via the Local Authority Complaint Handling Network of which the Council are a member.

6. Annual Complaints Report 2024/25

- 6.1 The Council is required by the Scottish Public Services Ombudsman (SPSO) to publish its Corporate Complaints Performance against the 8 Key Performance Indicators. Appendix 1 covers the period 1 April 2024 to 31 March 2025.
- 6.2 The average number of days taken to respond to Frontline complaints has remained within the target of 5-day target at 4.0 days in 2024/25 showing a slight increase but maintained positive position. These are complaints that do not require investigation. This continues to show the positive impact the central team has had in recent years.
- 6.3 Most complaints (60.9%) are categorised as Frontline (Stage 1).
- 6.4 The percentage of Frontline complaints handled within the 5 working day target set by the Scottish Public Services Ombudsman has also maintained a positive position at 83.9%. Whilst performance at the Frontline complaint stage continues to remain steady, work is still required to improve performance on Investigation (Stage 2) complaint performance. Of the complaints considered at stage 2, 50.6% were handled within the 20-working day timescale set by the SPSO, which has reduced from 52.2% in 2023/24 and still significantly short of the 80% Council set target.
- 6.5 Improvement at Investigation stage will remain a focus for the Complaints & Information Team and services across the Council in 2025/26, however it remains the case that there are a significant volume of complaints where investigations will take longer than the 20 working days. Where there is a delay, and in line with SPSO guidance, we aim to ensure customers are advised of this timeously and provided with the reasons for any delay, and ongoing liaison with the service is undertaken to ensure the delays are kept to as much of a minimum as possible.
- 6.6 This is recognised by the SPSO who allow for extensions within the Model Complaint Handling Procedure.

Designation: Assistant Chief Executive – Corporate

Date: 23 July 2025

Author: Angela Morrison, Complaints and Information Manager

Background Papers: N/A

Appendices:

Appendix 1 - Annual Complaints Performance Report 2024/25

Appendix 2 - Functions where more than 10 complaints (all stages) have been received in rank order

Annual Complaints Performance Report 2024-2025

Listening * Open * Valuing * Improving * Supporting * Partnering * Delivering
Èisteachd * Fosgailte * Luach * Leasachadh * Taic * Com-pàirteachas * Libhrigeadh

Ambitious

Sustainable

Connected

www.highland.gov.uk

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Executive Summary

The Council's definition of a complaint is: *"An expression of dissatisfaction by one or more members of the public about the local authority's action or lack of action, or about the standard of service provided by or on behalf of the local authority."*

This report details the Council's corporate complaints performance in 2024-25, against Key Performance Indicators laid down by the Scottish Public Services Ombudsman (SPSO) for all Scottish Local Authorities. In this report, we will explain how the Council have performed against these indicators and how we value complaints to improve and inform service delivery. The Council is committed to providing high quality and timely services. Sometimes, as a customer you may feel that the service you received has fallen below the Council's standards. When this happens, we want to understand the situation, fix any issues quickly and learn from them.

Our Complaints Handling Procedure reflects the Council's commitment to valuing complaints and seeing them as a way of improving our services. We will seek to resolve customer dissatisfaction as close as possible to the point of service delivery and undertake a thorough, impartial, and fair investigation of all complaints, whilst ensuring responses are delivered on time and are of a consistent high quality.

On 16 July, 2024, the United Nation Convention on the Rights of Children (UNCRC) (Incorporation)(Scotland) Act 2024 became law which ensures that children's rights are central to policy and decision-making, and that their needs are met by public service complaints procedures in Scotland. The Council has fully implemented the child-friendly process for public bodies to handle complaints.

If you wish to provide feedback on this report, we welcome your comments. To do so please:

By [email ComplaintsandInformation@highland.gov.uk](mailto:ComplaintsandInformation@highland.gov.uk)

or write to: Complaints & Information Team, Highland Council Headquarters, Glenurquhart Road, Inverness, IV3 5NX.

Allan Gunn - Assistant Chief Executive (Corporate)

Report Headlines

Most complaints **60.9%** are categorised as Frontline (Stage 1) and of those, **45.7%** were resolved at that stage, and did not require an Investigation.

The average number of days taken to respond to frontline complaints is within the target of 5 working days and is **4.0 days in 2024/25**, slightly increased from 3.7 days in 2023/24. These are complaints that do not require an investigation.

The percentage of frontline complaints handled within the 5 working day target set by the Scottish Public Services Ombudsman has again improved to **83.9%** compared to 81.2% in 2023/24. There has been a slight decrease in Investigation complaints closed within 20 working days to 50.6% from 52.2% in 2023/24. Where a complaint does not meet the timescale, the complaint may be extended and the customer kept informed.

There is still work to be done to continuously improve our performance and the Complaints & Information Team aims to drive and support the change required directly with responsible Services. While most frontline complaints are now handled within target timescales (5 days), (and therefore avoiding escalation) in 2024/25, it remains the case that Investigation and Escalated complaints still require significant resource to improve timescale performance, this will remain a focus for the team, continuing the work with colleagues across the Council, in 2025/26.

Background

Customer enquiries, requests for service and complaints are recorded on our customer relationship management system. For context there were **389,423 transactions in 2024/25** of which **1,259 (0.3%)** were customer complaints.

Scottish Councils operate a complaints process which considers complaints as either:

- **Frontline** - straightforward issues that are easily resolved, requiring little or no investigation. This could mean an on-the-spot apology, explanation, or other action to resolve the complaint within 5 working days.
- **Investigation.** For issues that have not been resolved at the frontline or that are complex or require a detailed examination before we can state our position. We aim to provide a definitive response within 20 working days following a thorough investigation of the points raised.

This mandatory complaint process is defined by the Scottish Public Services Ombudsman (SPSO). It is important to note that a complaint does not need to be considered at Frontline resolution before progressing to Investigation. When a complaint is received, the Customer Resolution and Improvement Team decide the appropriate stage - in many instances the team can now resolve the complaint straightaway. Where customers are dissatisfied with our decision following an Investigation, they can ask the Scottish Public Services Ombudsman to consider their complaint further.

Child Friendly Complaints

On July 16 2024, the United Nation Convention on the Rights of Children (UNCRC) (Incorporation)(Scotland) Act 2024 became law and public bodies in Scotland adopted the Scottish Public Services Ombudsman's child-friendly way to handle complaints.

The Council follow the SPSO's [principles](#) which underpin how to handle and investigate complaints from or involving children, in a way that respects their rights under the UNCRC. The [guidance](#) sits alongside the principles and existing complaints handling procedure to inform best practice.

Scottish Public Services Ombudsman Annual Performance Indicators

The Scottish Public Services Ombudsman has established **8 performance indicators** which are used by local authorities to monitor complaints and to benchmark their performance with other local authorities which are similar in scale and demography.

These are set out below together with the Council's annual performance for 2024/25. For comparison purposes, the performance data for the previous two years is also provided where applicable.

Indicator 1 - The total number of complaints received per thousand population.

This indicator records the total number of complaints received by the Council in the period 1 April 2024 to 31 March 2025 per 1,000 population.

For Highland there were 5.2 complaints logged per 1,000 of population during 2024/25, an increase of 0.4 from 2023/24.

	2022/23	2023/24	2024/25
Population Estimate	238,060	238,060	238,060
Complaints per 1,000	3.8	4.8	5.2

The Council validated a total of **1,259 complaints** in 2024/25, an increase from 2023/24 of 0.9% (1,146 complaints). Policy and legislative changes, together with seasonal, social, economic, and other external factors throughout the year, can all influence the volume of complaints received, however in addition, extensive work has been undertaken by the Complaints and Information Team to only progress complaints as defined by the Model Complaints Handling Procedure via our assessment process.

Citizens who choose to engage digitally with the Council's complaints process receive email and telephone responses, which provide quicker delivery timescales than traditional methods, however complaints may be submitted by a variety of methods including letter, face-to-face, email, online form, or by contacting their local Councillor. The Council understands that customers may be unable, or reluctant to make a complaint and we can accept complaints from a friend, relative or advocate if they are given consent to complain on their behalf.

Indicator 2 - Complaints closed at Frontline and Investigation as a percentage of all complaints closed.

The term 'closed' refers to those complaints where a response has been provided to the customer, and at the time no further action is required (regardless of whether it is Frontline or Investigation and whether any subsequent action takes place).

This indicator provided information on the number of complaints closed at Frontline, Investigation and those Frontline complaints that have been closed and subsequently progressed to Investigation due to the customer's request or where the timescale for a Frontline response has elapsed.

	% of all Cases closed 2022/23	% of all Cases closed 2023/24	% of all Cases closed 2024/25
Closed at Frontline	62.6	58.5	60.9
Closed at Investigation	25.4	30.8	28.2
Closed after progression from Frontline to Investigation or where the Frontline timescale has expired	12	10.7	10.9

There were **1,236 complaints closed** during 2024/25, 753 (60.9%) at Frontline, 348 (28.2%) at Investigation and 135 (10.9%) after progression from frontline to investigation (escalated). Most of our complaints are received and resolved at frontline.

Indicator 3 - The number of complaints upheld or partially upheld/not upheld at each stage as a percentage of complaints closed in full at each stage.

There is a requirement for a formal outcome to be recorded for each complaint. Formal outcomes are the complaint is either **upheld, partially upheld, not upheld** or **resolved**.

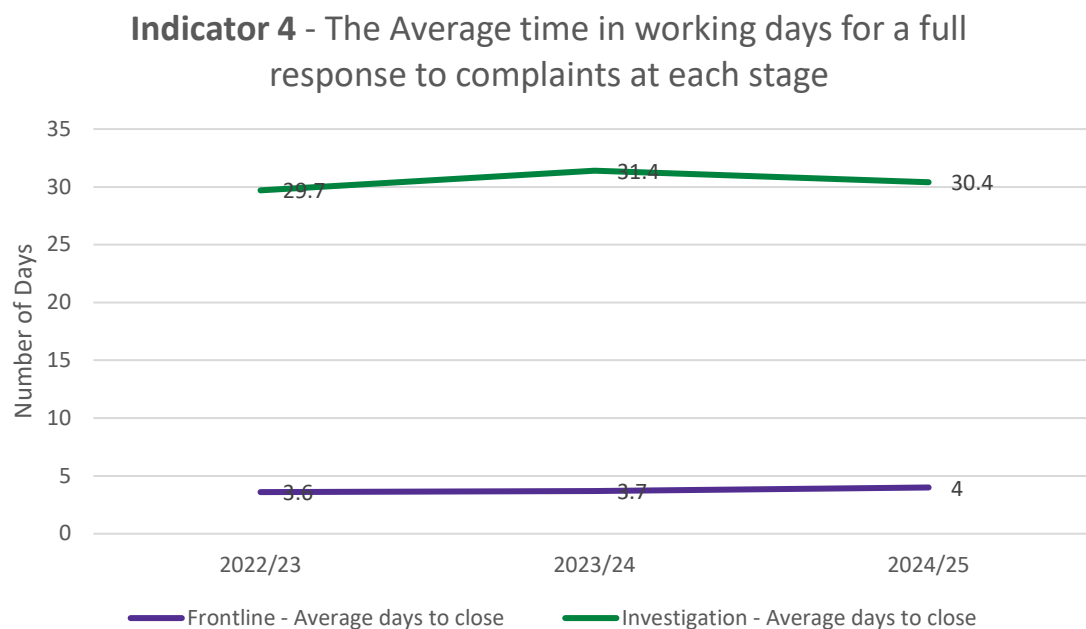
A resolved outcome is where both the Council and the customer has agreed the case has been resolved to a suitable resolution and can be closed. Performance over the last three financial years is shown in the table below.

	Upheld	Partially Upheld	Not Upheld	Resolved
Frontline				
2022/23	3 (0.5%)	1 (0.2%)	16 (2.8%)	549 (96.5%)
2023/24	53 (8.4%)	52 (8.3%)	93 (14.8%)	430 (68.7%)
2024/25	165 (21.9%)	90 (12.0%)	154 (20.5%)	344 (45.7%)
Investigation				
2022/23	39 (16.9%)	66 (28.6%)	101(43.7%)	25 (10.8%)
2023/24	58 (16.7%)	80 (23.1%)	181 (52.2%)	28 (8.1%)
2024/25	56 (16.1%)	112 (32.2%)	156 (44.8%)	24 (6.9%)

Indicator 4 - The average time in working days for a full response to complaints at each stage.

The Council aims to respond to **Frontline** complaints within **5 working days** and an **Investigation** complaint within **20 working days**.

As shown on the chart below, the average number of days taken to respond to **Frontline** complaints has continued to remain steady with a slight rise in **2024/25 to 4 days**. The average number of days taken to respond to **Investigation** complaints has dropped slightly but remains higher than target. Where a complaint is not responded to within 20 working days, the customer is informed, and the case is extended. In addition, the case is escalated in terms of management oversight.



Indicator 5 - The number of complaints which were closed in full within the set timescales of 5 working days and 20 working days.

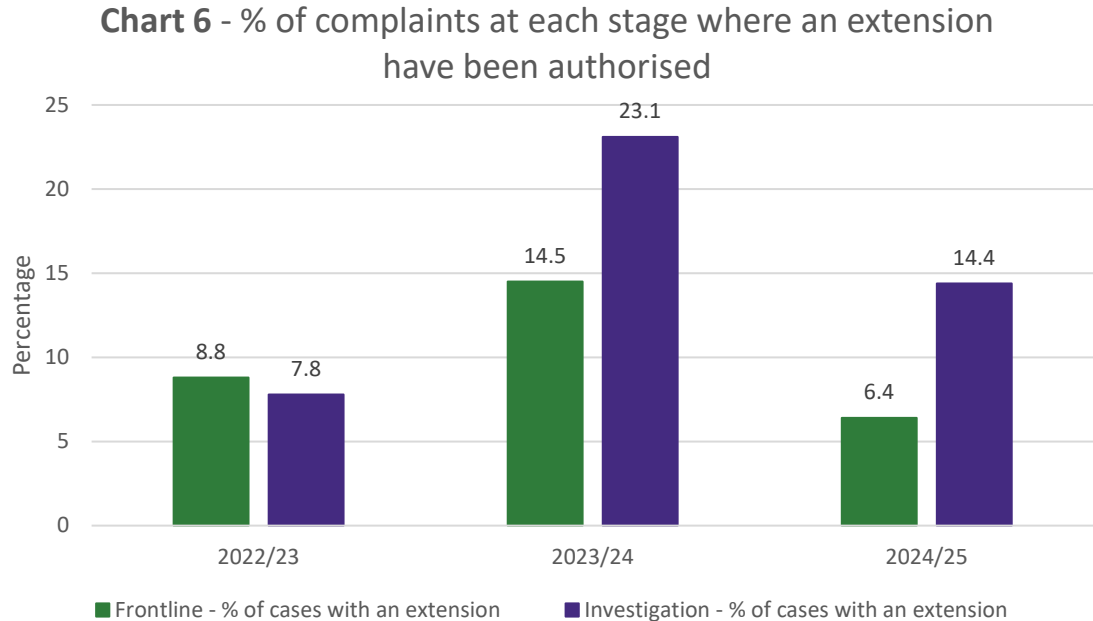
This indicator reports the number and percentage of complaints at each stage which were closed in full within the set timescales of 5 and 20 working days, including cases where an extension to the timescales has been agreed.

	2022/23	2023/24	2024/25
Number closed at Frontline Resolution	463	510	632
% within 5 working days	81.4%	81.1%	83.9%
Number closed at Investigation	96	181	176
% Investigation closed within 20 working days	41.6%	52.2%	50.6%
Number closed at Escalation	109	57	55
% Escalation closed within 20 working days	28.4%	44.9%	40.7%

Council performance on the number of frontline complaints managed within the 5 working day target set by the Scottish Public Services Ombudsman has continued to improve on previous figures and evidences the effective work of the Complaints & Information Team to answer as many complaints as possible at Frontline without referral to back-office staff. There continues to be significant work to maintain response times on Investigation complaints as there are several interlinked reasons for the lower level of performance – including the complexity of cases which requires further investigation time, and periods of absence in both the Complaints and Information Team and Services during holiday periods or sickness.

Indicator 6 - The number and percentage of complaints at each stage where an extension of 5 or up to 20 days timelines have been authorised.

48 (6.4%) of frontline complaints (91 during 2023/24) were authorised with a 5-day extension. 50 (14.4%) investigation complaints were authorised with an extension up to 20 working days. With agreement from the customer, we apply for an extension when it is deemed necessary and due to the complexity of the issues.



An extension to a complaint is by exception and is generally approved by the Complaints & Information Manager in conjunction with Service/Strategic Leads or Chief Officers. We will continue to challenge our frontline performance for extending the number of days to resolve these complaints. Our aim is to further reduce the number of instances when extensions are necessary.

Indicator 7 - The Complaints Handling Procedure followed by the Council requires us to report on customer satisfaction with the complaints service provided.

Normally the Council conducts an annual survey of performance and attitudes from its Citizens' Panel to inform customer satisfaction. It includes specific questions on complaint management and performance. However, due to the COVID-19 pandemic the survey has not been run since 2019. It was proposed to develop a feedback mechanism for customers using the complaints process and gather their feedback directly and have this available for 2024/25, however this has been scheduled for 2025/26 to link in with wider improvement work.

Indicator 8 - Outlining improvements to services or procedures as a result of the consideration of complaints

The central team manages a number of different processes such as Freedom of Information, requests Data Rights Requests and MSP/MP/CEX Correspondence. In October 2024 the team moved from the Customer Services team into the Legal and Corporate Governance Team as part of the Corporate Service Cluster and this allows the team to align with colleagues to streamline and strengthen processes.

The primary focus in the coming year is on utilising technology and improved systems to cut out unnecessary admin of each process within the Complaints and Information Team. This includes –

- Exploring Virtual Intelligence solutions to assist with redaction of Freedom of Information and Data Rights Requests
- Identification of a case management system to remove duplication with emails and multiple systems.

Compliments received

During 2024/25 the Council also received compliments for services provided. Customer are able to record positive feedback via our website - [Give a compliment](#). Some examples of compliments received during this time are detailed below -

- *"I would like to praise your staff in the Recycling Centre. They are always pleasant, courteous and can't do enough to help".*
– **Waste Management**
- *"The plumber attended this morning, and I wanted to say thank you for the exceptional service received. They scored 10 out of 10".* **Housing Repairs**
- *"I would like to compliment the refuse department on the way they have dealt with the new bins. The information was very easy to understand and the change over is very easy to follow".* - **Waste Management**
- *"I am writing in praise of all the Operations Team I have dealt with on the telephone at your office. I cannot speak highly enough for the polite efficient service. Such a pleasure to have someone on the other end of the telephone explaining".* – **Council Tax Operations Team**
- *"The customer would like to convey a massive appreciation to the roads team for responding quickly to his request. He is very grateful for the work that you've done on his Street."* – **Roads**
- *"My granny called environmental health. They responded very quickly to her call and she was very impressed with the service"* – **Environmental Health**
- *"I cannot thank you enough for the quick response in dealing with the problem at my family lairs. We were delighted the work has been done and I cannot express how the family felt on going up to see it completed".* – **Burials/Amenities**
- *"Our child was referred to the Child Health Team. The member of staff was warm, caring and a fun spirit for him to be around and provided a plan for supporting us and checked in regularly".* – **Child Health**

Complaints investigated by the Scottish Public Service Ombudsman (SPSO)

When a customer is not satisfied with our final response to a complaint, they can ask the Scottish Public Service Ombudsman to investigate their complaint. The Scottish Public Service Ombudsman is the final arbiter for complaints about public services.

Each year elected members are presented with a report which set out the number and types of complaints relating to the Council that have been considered by the SPSO and the subsequent judgements in the cases where the Scottish Public Sector Ombudsman's inquiry has concluded. The report on the cases determined during 2024/25 will be presented to the Audit Committee in August 2025. Key points from the report include:

- The SPSO chose to use her discretion and did not investigate 36 of the 100 cases considered during the period. This was on the basis that the Council had demonstrated a good complaint handling process in its response to the customer.
- The SPSO also decided that no full investigations into complaints against the Council were required during the year. As a result, there were no complaints upheld or partially upheld against the Council by the SPSO in 2024/25.

Table 1 - Functions where more than 10 complaints (all stages) have been received in rank order – comparison

	Number of complaints (22/23)	Number of complaints (23/24)	Number of complaints (24/25)	New Ranking (previous in brackets)
Schools	116	160	197	1 (1)
Waste Services	109	121	191	2 (3)
In-House Building Maintenance Team/ Repairs	102	142	128	3 (2)
Revenues*	64	76	108	4 (6)
HRA (Management of Council Housing)	78	102	103	5 (4)
Roads	69	109	98	6 (5)
Planning	50	37	65	7 (7)
Customer Services	34	36	54	8 (8)
Grounds Maintenance**	18	18	30	9= (10)
Licensing	n/a	13	30	9= (13)
Public & School Transport	n/a	18	21	10 (18)
Environmental Health	16	14	20	11 (12)
Children's Services: Social Care	34	30	19	12= (9)
Elections	n/a	n/a	19	12= (n/a)
Burials & Cremations**	10	14	17	13 (12)
Car Parking	10	17	11	14= (11)
Insurance	n/a	n/a	11	14= (n/a)

Notes:

*Taxation and Revenues were previously ranked together

**Grounds Maintenance and Burials were previously ranked together

***Schools includes ASN, Primary Schools, Secondary Schools, Learning/Teaching and 'Schools – other'

Removed from list this year due to low numbers of complaints - Winter Maintenance, Environment and Public Conveniences