



Transformation and Improvement Overview and Scrutiny Committee

Date 8th September 2025

Item

Public



Annual Customer Feedback Report 2024/25

Responsible Officer:	Tim Collard		
email:	Tim.Collard@shropshire.gov.uk	Tel:	01743 252756
Committee Chair:	David Minnery		

1. Synopsis

This report presents the Annual Customer Feedback Report 2024/25 to the Transformation and Improvement Overview and Scrutiny Committee. The report was considered by Cabinet in July and a second report is due to be presented to Cabinet in October setting out more detailed information regarding the Local Government and Social Care Ombudsman's Complaint Handling Code ('the Code'). The annual report included a self-assessment against the Code (attached as Appendix 1).

2. Executive Summary

- 2.1 The Annual Customer Feedback Report 2024/25 sets out key performance information relating to the way Shropshire Council manages its complaints processes (see Appendix 1). This report summarises that performance in the context of the Complaint Handling Code introduced by the Local Government and Social Care Ombudsman for implementation by the end of March 2026. The report highlights requirements set out within the Code, including the difference between current and future resource needs, and emphasises the importance of Overview & Scrutiny in overseeing complaint handling performance.
- 2.2 The Code applies to complaints without statutory processes and promotes annual reporting and scrutiny to ensure transparency and accountability. Non-compliance with the code will be publicly highlighted by the Ombudsman from April 2026. Organisations must publish an annual complaints performance and

service improvement report, including responses from the Member responsible for complaints, demonstrating oversight and accountability.

- 2.3 Shropshire Council completed a self-assessment against the Code in July, with a detailed action plan and further updates planned for October, addressing significant changes required by the Code.
- 2.4 Members are encouraged by the Ombudsman to oversee work to analyse complaint trends, resource adequacy, and public access to complaints processes. The Code emphasises that high complaint numbers may indicate an accessible process, whereas low numbers could suggest barriers and discourages the setting of targets. However new Key Performance Indicators have been produced by the Ombudsman and aim to improve benchmarking at the earlier stages of complaints processes.
- 2.5 The Code sets response times to encourage prompt handling. It suggests that the Member Responsible for Complaints should review response rates and encourage officers responsible for complaints (those responsible within service areas and those overseeing the complaints process) to work to address any trends and patterns within complaints as they arise to ensure a focus on ongoing service improvement. A particular focus within the Code is improvement in the way actions and learnings are recorded and work to encourage early resolution and remedy.

3. Officer Recommendations

- 3.1. Members are asked to review Shropshire Council's current performance in relation to complaint handling and the performance improvements that will be required before the end of March 2026.
- 3.2. Members are asked to consider the requirements and related challenges associated with the Code's implementation and make any suggestions and recommendations for the report to Cabinet in October.
- 3.3. Members are asked to support the requirement within the Code for Overview and Scrutiny of complaints handling processes and plan future Scrutiny of this item.

Report

4. Financial Implications

- 4.1. Investment is required to enable Shropshire Council to implement and comply with the Ombudsman's Complaint Handling Code (this will be a mix of staff resource and small budget allocation to produce resources and deliver training). A detailed action plan has been produced highlighting required resources, and this will be shared internally with the Leadership Board for consideration. This more detailed work can be shared more widely if required.

5. Climate Change Appraisal

- 5.1. There are no direct effects on the council's climate change agenda.

6. Background

- 6.1. The Local Government and Social Care Ombudsman's (LGSCO) Complaint Handling Code has been issued as "advice and guidance" for all local councils in England under section 23(12A) of the Local Government Act 1974. The Ombudsman has asked local authorities to start applying the Code as soon as possible and to ensure implementation by the end of March 2026. The Code only applies to complaints where there is no statutory process in place. From 1st April non-compliance will be highlighted by the Ombudsman within investigations and public reports.
- 6.2. The Local Government and Social Care Ombudsman's Complaint Handling Code (Paragraph 8.1) states:
- "Organisations should produce an annual complaints performance and service improvement report for scrutiny and challenge"*
- 6.3. The Code states that the annual complaints performance and service improvement report should be published on the organisation's website. This should include the response to the report from the Member responsible for complaints. This demonstrates to the public that complaints about the organisation are subject to scrutiny and that statutory officers are being held accountable for performance.
- 6.4. Members are not expected to have any direct involvement in individual complaints, but they are encouraged to use learning from the complaints process to support their scrutiny and oversight work.
- 6.5. As part of annual reporting, local authorities are asked to complete a self-assessment to demonstrate compliance with the code. Shropshire Council presented a self-assessment within the annual Customer Feedback Report covered within Cabinet's meeting in July (attached as Appendix 1).
- 6.6. The Ombudsman Code requires significant changes across a number of areas. A detailed action plan has been produced and a summary of the main areas of activity will be presented to Cabinet in October.
- 6.7. Organisations are strongly discouraged from setting targets in relation to complaint handling as this can result in officers focusing meeting these rather than providing a good outcome to the complaint. However, the Ombudsman does recommend use of a new set of Key Performance Indicators. These indicators will require some changes to the way Shropshire Council collects and reports complaints data. Work to introduce the KPIs is set out within the detailed Code implementation plan.
- 6.8. Whilst the new KPIs are not yet in place. They cover:

- Number of complaints received.
- Timeliness
- Outcomes
- Learning from complaints and remedies

These are all featured within the Annual Customer Feedback Report, however, to assist Scrutiny information is provided on each below.

7. Performance

Number of complaints received

7.1. The Complaint Handling Code states:

“High volumes of complaints should not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that individuals are unable to complain.”

- 7.2 Members are encouraged to consider any increases or decreases in complain numbers and in individual service areas and also to check that complaints are not being excluded from the complaints process, denying people an opportunity to have their complaint heard.
- 7.3 Shropshire Council's way of working aligns with the Code by allowing choice within the method of making a complaint (telephone, email, online formal, letter etc.). Although online methods of promoting the complaint process are dominant, leaflets and alternatives are also available.
- 7.4 Within the year 2024/25 Shropshire Council received and recorded 3,079 cases of formal feedback (2,386 initial complaint cases, 245 comments and 448 compliments). There were 2,629 cases in the previous year, and this equates to a 17% increase. The number of complaint investigations do not show the same increase with little change (978 in 2023/24 and 952 in 2024/25). It should be noted that one case may result in no complaint investigation if the complaint is excluded from the process, or in multiple investigations if the complaint covers multiple service areas or types of issue.
- 7.5 Exclusions data shown below in Table 1 highlights that a significant number of people attempted to raise complaints anonymously (398 of the 725 exclusions). Anonymous complaints cannot be investigated. 66 could be resolved immediately and cases were also raised as complaints when they required handling under a different process. This highlights that there is a need to improve initial triage within Shropshire Council to ensure that as many initial contacts as possible are addressed as service requests and complaints are not raised as an initial form of contact.
- 7.6 There has been a 55% increase in customer feedback from 2016/17 but the resources allocated to manage the processes have not changed within this timeframe. Investigation numbers remain similar to last year, but it is likely that this could be partially influenced by a lack of capacity to manage more investigations than any reduction in demand for complaints (where at all possible, an issue will

be raised for service action unless there is initial suggestion of fault requiring formal investigation). Benchmarking with other local authorities pre-introduction of the Code (2021/22 data) highlighted that team sizes were generally much larger in other similar local authority areas. Average case load per complaints officer per year in Shropshire was, at that time, 282 complaints compared to an average of 118 for 8 other similar local authorities we undertook research with. This equates to 138% more cases per officer. The Ombudsman recommends that issues like this are considered within scrutiny of complaints processes (including by Overview & Scrutiny committees) and reflected within the annual self-assessment process.

Table 1 – Exclusions (complaints cases not investigated)

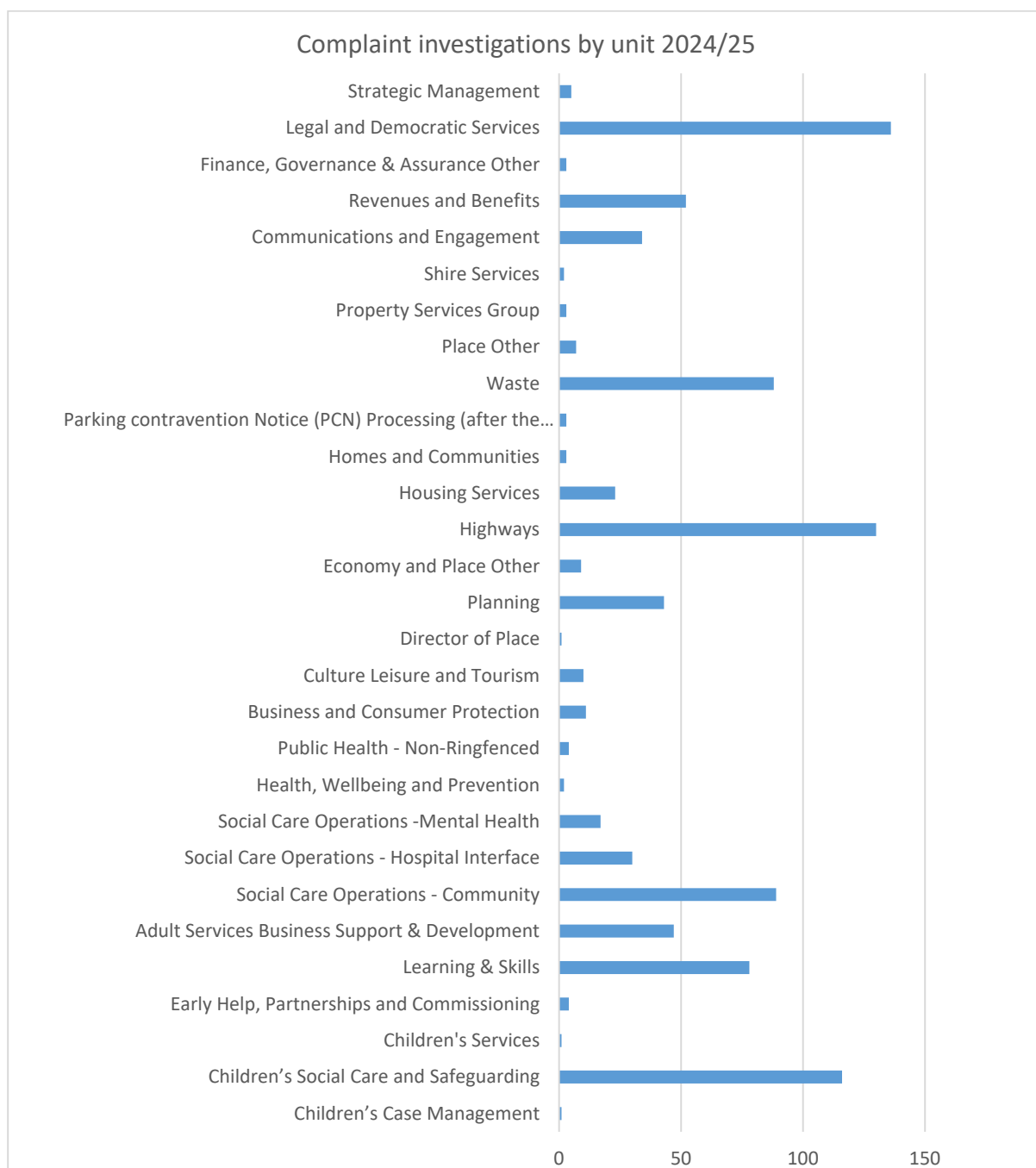
Cases not accepted as formal complaints for investigation Early Closure Reason	Count	%
Immediate Resolution	66	9.1
No Further Action Required	10	1.4
Anonymous Case/ insufficient detail to investigate	398	54.9
Call Abandoned	2	0.3
Customer withdrew complaint/ Customer didn't respond	22	3.0
Failed to Provide Consent	10	1.4
Outside Jurisdiction	94	13.0
Other Organisation to respond	2	0.3
Logged In Error	3	0.4
Disciplinary and Grievance Procedures	10	1.4
Housing Benefit Appeal	1	0.1
Insurance Claim	59	8.1
Licensing Decision Appeal	3	0.4
Penalty Charge Notice	4	0.6
Planning Enforcement Appeal	1	0.1
Planning Permission Appeal	4	0.6
Special Educational Needs (SEN) Tribunals	1	0.1
Police Investigation - Criminal	1	0.1
Outside Timeframe/Old (12 months)	9	1.2
Service request/ premature/ created in error	25	3.4
Total	725	100

7.7 The annual report also covers complaint numbers by service (note this was prior to council restructuring). Chart 1 displays the results for 2024/25. Legal and Democratic Service numbers are high to reflect the fact that both the Feedback and Insight Team and Complaints Monitoring Officer (undertaking stage 2 corporate reviews) are located within that area of the council.

7.8 Highways and Transport complaints traditionally form a large proportion of all complaints and in 2024/25 formed 14% of all Shropshire Council's complaints (an increase from 12% in 2023/24 but an improvement on the 19% in 2022/23 and 27% in 2021/22). Waste services complaints have also fluctuated slightly from 14% in 2022/23 to 6% in 2023/24 and 9% in 2024/25. These are services used by all residents. Revenues and Benefits received a significant proportion of complaints at 5% similar to the last year. Planning Services complaints formed 5% (the same proportion as the previous year). Some service areas with slightly higher volumes of complaints reflect the national picture across other local authorities. Children's social work case management, SEND (Special Educational Needs and Disabilities) and adult social care complaints are among areas of service nationally where there are growing demands and pressures leading to complaints.

7.9 Another indicator linked to complaint numbers is the progression of complaints (see Annual Report Section 4). Effective stage 1 complaint handling can reduce the number of stage 2 complaints, however over recent years there has been a steady increase in complaints progressing beyond stage 1 (an 11.6% increase since 2023/24).

Chart 1 - Complaint numbers by service area



Timeliness

7.10 The new timescales for responding to complaints set out in the Code are intended to encourage prompt and efficient complaint handling. The average time for responding to complaints should indicate how often the organisation is responding promptly to complaints. The LGCSO has suggested this is reported as the % of

total complaints at each stage (and that the measure is also applied to statutory complaints processes).

7.11 The table below illustrates the timescale changes required and the significant reduction compared to existing processes:

Table 2 - Timescales

Process	Shropshire Council's current corporate complaints timescales	Ombudsman's Complaint Handling Code timescales
Stage 1 acknowledgement	5 working days	5 working days
Stage 1 response	30 working days	10 working days
Stage 1 extension	Not applicable	10 working days
Stage 2 acknowledgement	5 working days	5 working days
Stage 2 response	30 working days	20 working days
Stage 2 extension	Not applicable	20 working days

7.12 During 2024/25 Shropshire Council took an average of 23 working days to respond to stage 1 corporate complaints (exceeding the new Code stage 1 timescale). Only 27% of stage 1 corporate complaints are currently responded to within the Ombudsman's 10 working days timescale, compared to 72% against the Council's current 30-day timescale.

7.13 More detailed analysis of timescales highlights that the service areas responding to complaints most promptly include (Independent Living, Welfare & Reform, Finance and Trading Standards & Licensing). The service areas with the longest average response times are Highways, Building Control, Development Control and Council Tax Payments. Please note this excludes services that miss social care statutory complaints timescales).

7.14 The average for stage 2 reviews has been within the current 30 day timescale (at 28 working days) but may now need to be reduced in line with new timescales. However, it should be noted that stage 2 complaints will have a 20 initial day timescale with a 20 additional day extension for complex cases or where there is another acceptable reason for extension.

7.15 Before the end of March 2026 there is work required to change the way timeliness is reported in line with the new Key Performance indicators included within the Code. Rather than averages alone, the timescale KPIs to be introduced are:

- a. % accepted complaints responded to within 15 working days at stage 1
- b. % accepted complaints responded to within 25 working days at stage 2

Outcomes

7.16 The outcomes of complaints are an important measure of the quality of complaint handling in an organisation and data can be used to identify areas where repeat findings may indicate wider issues which need to be addressed.

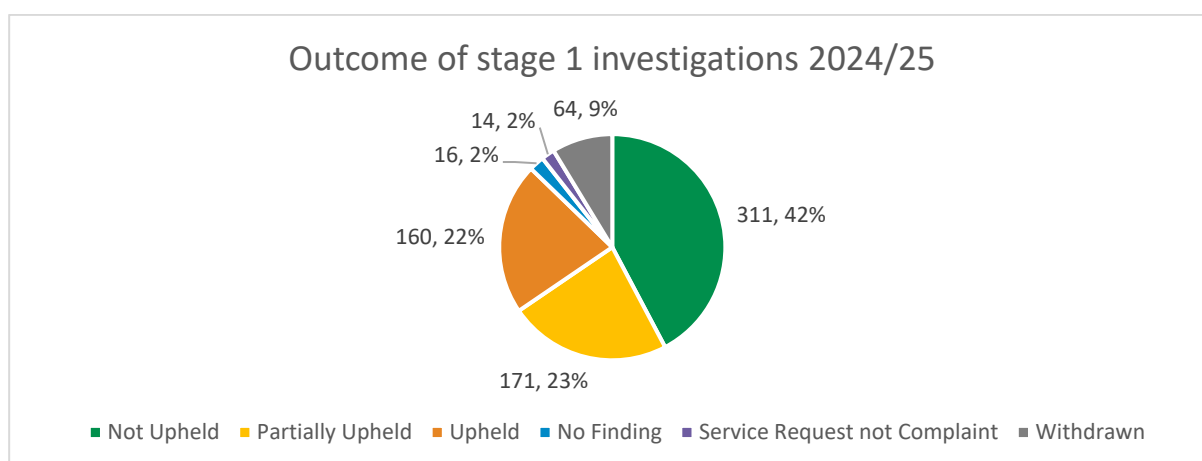
7.17 Under the Code a new outcome is being introduced (in addition to Upheld, Partially Upheld and Not Upheld): Resolved. The definition for resolved is quoted below.

Allowing organisations to record complaints as “resolved” supports prompt proportionate responses to complaints. Although service areas are already encouraged to try to resolve issues raised within a complaint while the investigation is ongoing, this will require significant changes in the way complaints are viewed and handled within service areas.

“The organisation was able to agree action it should take with the complainant to resolve the complaint and did not have to investigate further to decide whether it acted with fault”

- 7.18 Of the closed stage 1 complaints 22% were upheld (160 complaints), 23% were partially upheld and 42% were not upheld. The proportion of upheld complaints in 2024/25 was less than in 2023/24 (27%). Performance is relatively steady overall. It would be a concern if performance monitoring highlighted too few cases being upheld (it is important that Shropshire Council accepts where things have gone wrong and strives for improvement).

Chart 2 – Outcomes of stage 2 investigations



- 7.19 However, as the Annual Customer Feedback Report highlights, there are some service areas with greater upheld rates indicating areas of pressure. Considering the complaints that were upheld (all stages closed within the year), 21% were with Highways and Transport (a significant improvement compared to 2021/22 at 32% but more than the 17% in 2023/24). 18% were for Special Educational Needs and Disability within Learning and Skills, 14% Adult Social Care Operations - Community and 9% were with Waste Management. Although in smaller numbers, there were also a higher proportion of upheld cases for Adult Services Business Support (linked to charges for care (7%) and Customer Services (5%)).

Learning from complaints and remedies

- 7.20 Within the new Code, the LGSCO highlights that remedies should be provided within timescales provided to complainants. Failure to do this may lead to further complaints and a decrease in the level of trust between the individual and the organisation. All complaint investigators are asked to include clear actions and learning where fault has been found (a complaint up upheld or partially upheld). The Annual Customer Feedback Report includes sections on learning and actions with overall data and examples. However, the Code suggests the current approach is not robust enough. The Code states:

“Service improvements are difficult to quantify. Therefore, organisations are encouraged to provide qualitative data summarising the types of service improvements achieved as a result of learning from complaints. This may include learning from complaints data as well as individual complaints. If a particular service area has not recorded any service improvements this may warrant further scrutiny.”

- 7.21 Shropshire Council recorded learning, action or outcome notes against 705 complaints in 2024/25 (and 138 of those included detailed actions or lessons). Currently around 40% of all partly upheld or upheld closed cases have learning recorded and this will need to be an area of focused improvement in order to comply with the requirements set out within the Code.

8. Ombudsman Data and Benchmarking

- 8.1 The Annual Customer Feedback Report covers the annually reported findings of the Local Government and Social Care Ombudsman. The Ombudsman’s annual report highlighted that 79 complaints were received by the Ombudsman for Shropshire Council in 2024/25 and 31 cases were considered/decided (15 of those with an outcome). Of the 15 cases investigated with outcomes, 9 were upheld, 6 were not upheld. Many of the total 79 considered resulted in other actions such as referring back for local resolution, offering advice, or closure after initial enquiries.
- 8.2 The Ombudsman reports Shropshire Council’s upheld rate at 60%. The LGO upheld rate for similar local authorities is reported as 80%.
- 8.3 Information reported by the Ombudsman since the publication of Shropshire Council’s annual report, allows for some further benchmarking with other local authorities. Charts 3, 4 and 5 display how Shropshire Council compares to similar local authorities within the Chartered Institute of Public Finance Accountancy (CIPFA) statistical neighbours group. The charts cover total number of complaints, upheld rate and complaints per 100,000 population.

Chart 3 – Benchmarking data for total complaints

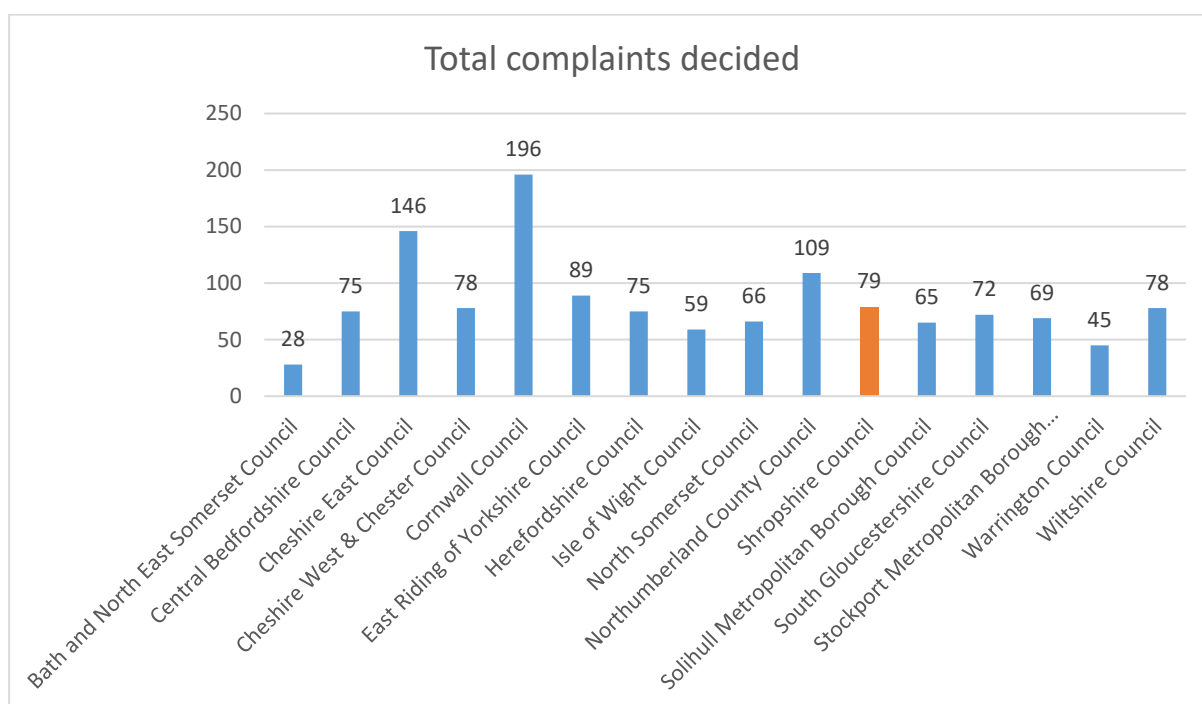


Chart shows total number of complaints considered by the Ombudsman in 2024/25 for each local authority.

Chart 4 – Benchmarking data for upheld rate

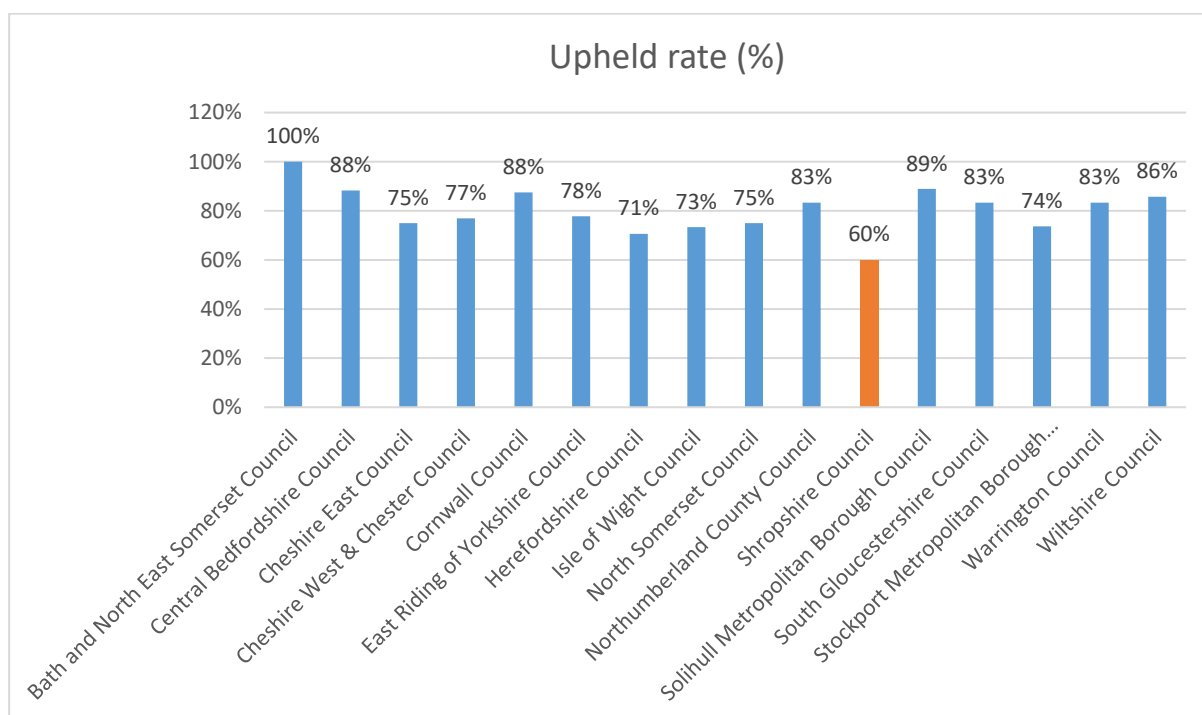


Chart shows proportion of complaints upheld by the Ombudsman in 2024/25 for each local authority (relatively small numbers means % can fluctuate significantly each year).

Chart 5 – Benchmarking data for rate per population

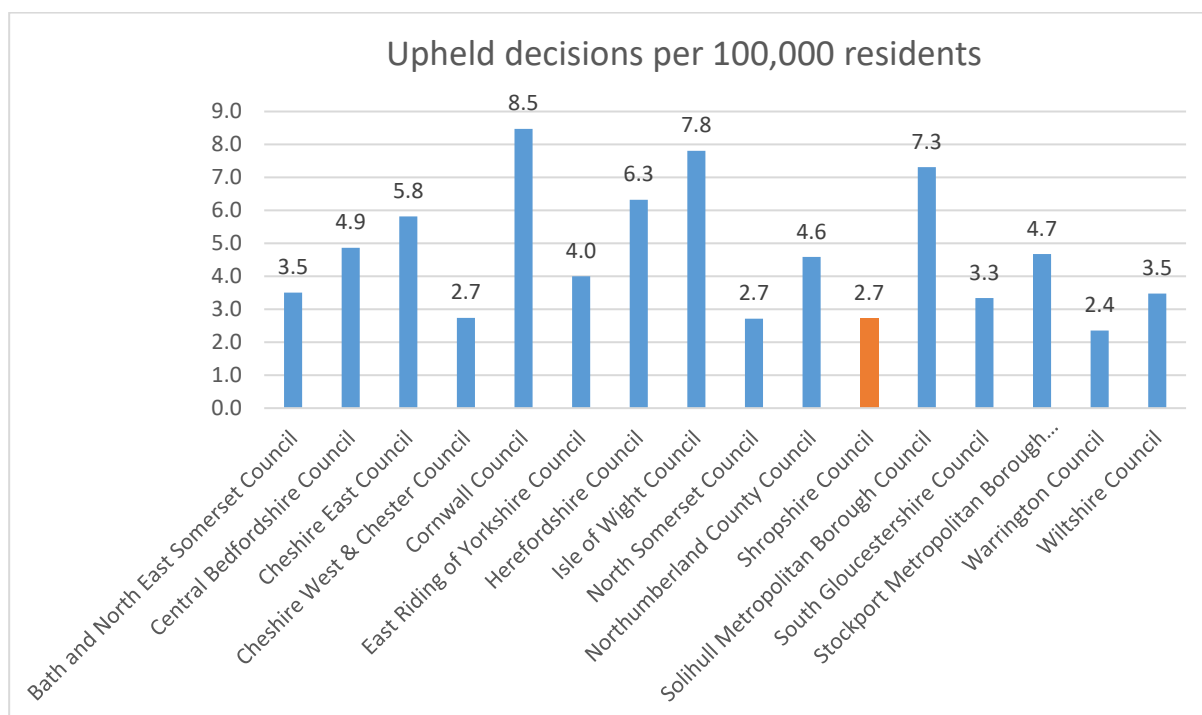


Chart shows the number of complaints considered by the Ombudsman per 100,000 residents.

- 8.4 The benchmarking data available suggests that Shropshire Council is currently performing well within its group of statistical neighbours. The upheld rate was the lowest within the group, and the rate of complaints per 100,000 population is the lowest reported rate (the same as Cheshire West & Chester and North Somerset). The number of complaints considered by the Ombudsman is probably the most

meaningful indicator and that number is slightly below the average (83). The results possibly suggest that more complaints are reaching the Ombudsman than they should be. The Code's emphasis on early resolution is designed to reduce these numbers.

9. Reporting and Member Roles

- 9.1 The Code states *"It is considered good practice for the Member Responsible for Complaints to have access to performance data about all complaints received by the organisation, even complaints not covered by the Code, such as those about adult social care and children's services. This provides the Member with an overview of complaint handling performance across the organisation"*. Quarterly reports are shared with the portfolio holder. These will be changed in time to better align with the new KPIs set out alongside the Code but are a useful indicator of performance.
- 9.2 There are new requirements within the Code that will require significant additional work. The Code describes that the Member Responsible for Complaints should have access to anonymised customer feedback information about complaint handling in the organisation. This could be in the form of responses to surveys or a summary of positive and negative comments received from complainants. Organisations are also encouraged to ask staff for feedback about their experiences of the complaints process. Members should also have access to this anonymised feedback. These new requirements are set out within the Code implementation action plan developed by the Feedback and Insight Team. Once in place this new source of information could be a helpful source for future Scrutiny of the complaints processes by Overview and Scrutiny committees.
- 9.3 In addition to a [Guide for members responsible for complaints: Effective scrutiny of complaint systems](#) the Local Government and Social Care has also published information for members undertaking Scrutiny across a wide range of service areas. This contains [Scrutiny Questions](#) by service area/function. A theme the Ombudsman sees within its work is presented, followed by possible questions the Ombudsman suggests Members can use to better understand the service locally and how improvements may be identified.

10. Conclusions

- 10.1. In conclusion, the Annual Customer Feedback Report for 2024/25 highlights the importance of implementing the Local Government and Social Care Ombudsman's Complaint Handling Code. The report details current performance and highlights the need for continuous improvement in complaint handling processes and the need for effective resource allocation to meet the Code's requirements.
- 10.2. The self-assessment against the Code, presented within Appendix 1, demonstrates our commitment to transparency and accountability. As we move forward, it is crucial to address the challenges associated with increased demands from customers and the requirements set out within the Code against a backdrop of resource limitations.

- 10.3. In relation to the future the role of Overview & Scrutiny, the Elected Member Responsible for Complaints and officer management and oversight are all important to ensure that the new Key Performance Indicators are effectively integrated into our reporting processes and the performance of the complaints processes are understood in a way that focuses on improvement. The upcoming report, to be presented to Cabinet in October, will provide further insights into the steps being taken to enhance our complaint handling capabilities.

11. Recommendations

- 11.1 The Annual Customer Feedback Report 2024/25 includes 16 recommendations for Shropshire Council to consider and implement within the year ahead. Many of these actions require wider organisational commitment and results cannot be influenced solely by the complaints officers within the Feedback and Insight Team or others with roles in the complaints processes such as the Complaints Monitoring Officer. The recommendations cover areas such as:

- Managing complaints performance (numbers, timeliness and quality).
- Improving a focus on outcomes, actions and learning from complaints to drive service improvement.
- Core work to implement the Code including the development of a new complaints procedure and supporting guidance (including a Remedies Policy and guidance on reasonable adjustments).
- Communications work with staff and members of the public.
- Work to implement new requirements related to third-party provider complaints (commissioned services).
- A focus on managing the most complex cases and taking action when unreasonable and persistent customer behaviour is identified.

- 11.2 In addition to acknowledging the recommendations made within the annual report, Members are asked to consider:

- Whether current strategic oversight of complaints functions is adequate to deliver the Code.
- Whether the level of resources available to Shropshire Council threaten implementation, and any recommendations for managing the challenges faced due to the significant increased work the Code presents for officers. (Code implementation is not supported by any national funding for local authorities).
- Whether there are opportunities for other Overview and Scrutiny committees to incorporate a customer handling and complaints focus into their work.
- Whether there are opportunities for changing the way complaints are viewed within the organisation, to understand the value of complaint information, and to support the Ombudsman's aim of achieving a positive complaints handling culture.

List of Background Papers (This MUST be completed for all reports, but does not include items containing exempt or confidential information)

Shropshire Council Customer Feedback Annual Report 2020/21, 2021/22, 2022/23, 2023/24, 2024/25.

Portfolio Holder:	Cllr Alex Wagner
--------------------------	------------------

Local Member:	N/A
----------------------	-----

Appendices:

Appendix 1: Annual Customer Feedback Report 2024/25