

# **Non-statutory Complaints Performance and Service Improvement Report 2024-25**

October 2025

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## Executive Summary

1. This report sets out complaints and casework performance in 2024-25 for those complaints covered by the corporate complaints policy. The report also includes analysis of complaints covered by the corporate complaints policy, which escalated to the Local Government and Social Care Ombudsman (LGSCO).
2. Overall performance for 2024-25 has improved slightly. We should start to see the benefits of the complaint-handling improvement project in 2025-26.
3. Whilst there are no specific recommendations, Mayor and Cabinet are asked to note and approve the contents of the report, and publish a response, as required by the LGSCO's complaint-handling code.

## Introduction

4. Our priorities for action are to work with partners to:
  - improve the well-being of the people of Lewisham
  - develop and engage local communities
  - improve public sector performance and delivery
5. Good complaint-handling is a way in which we can support those priorities. And as an organisation with a learning culture, we welcome customer feedback about our services and staff from residents and service users.
6. This annual report provides a comprehensive overview of our handling of complaints covered by our corporate complaints policy in 2024-25 – that is, complaints not covered by the statutory complaints procedures for adult social care, children's social care, and housing (landlord) service. It includes qualitative and quantitative analysis, summaries of types of complaint, and service improvements made as a result of learning from complaints.
7. Our self-assessment of our compliance with the LGSCO complaint-handling code is attached at appendix 1.

## Background

8. The introduction of the LGSCO complaint-handling code on 1 April 2024 required immediate revision of our corporate complaints policy. Historically, we had maintained a 3-stage corporate complaints procedure. From 1 April 2024, this became a 2-stage procedure, to comply with the code. This necessitated significant modifications to our complaint-handling software, iCasework. We carried out these changes as part of our cross-council complaint-handling improvement project, CHIP.
9. The LGSCO complaint-handling code also standardised timescales for acknowledging and responding to complaints. These timescales came into effect on 1 April 2024.

Stage	Investigated by	Acknowledgement	Response
<b>Stage 1</b>	Service manager	Within 5 working days of receipt	Within a further 10 working days
<b>Stage 2</b>	Head of Service (Corporate Complaints team for multi-faceted complaints)	Within 5 working days of receipt	Within a further 20 working days

10. As part of our changes following the introduction of the LGSCO complaint-handling code, we also introduced a new type of case, 'member complaints'. This allows members to log a complaint on behalf of a constituent using the member portal. It means we are properly counting all complaints, and, when appropriate, takes a complaint straight to the complaints procedure without first completing a member enquiry.
11. Some housing and children's services complaints may be dealt with, and counted, as corporate complaints, so it is possible that a small number of complaints counted in this report have also been counted in the separate reports for housing and children's services.
  - Housing complaints which are not about the council in its role as a landlord are counted as corporate complaints. These tend to be complaints about housing needs and refugee services.
  - Complaints about special educational needs and school transport are dealt with as corporate complaints. Complaints about child protection may also be excluded from the statutory process.

## Complaint volumes

Stage	2024-25	2023-24	2022-23
<b>Stage 1</b>	4914	4251	2236
<b>Stage 2</b>	162	97	56
<b>LGSCO</b>	33	26	20

12. The number of non-statutory complaints has more than doubled since 2022-23. But there is evidence that in some high-volume services, the proportion of complaints meeting the definition of a complaint is less than 10%. This is a recording issue rather than a handling issue – the complaints are being handled as a request for service, but not re-categorised on iCasework.
13. Only 162 out of 4914 complaints escalated to stage 2, an escalation rate of just over 3%. This is consistent with the two previous years. A low escalation rate suggests that most of our stage 1 responses successfully address or resolve the complaint. But a low escalation rate may also indicate that our stage 1 responses do not provide clear information about how to escalate a complaint. We have addressed this in training and in the stage 1 response template, and include this in quality checking.

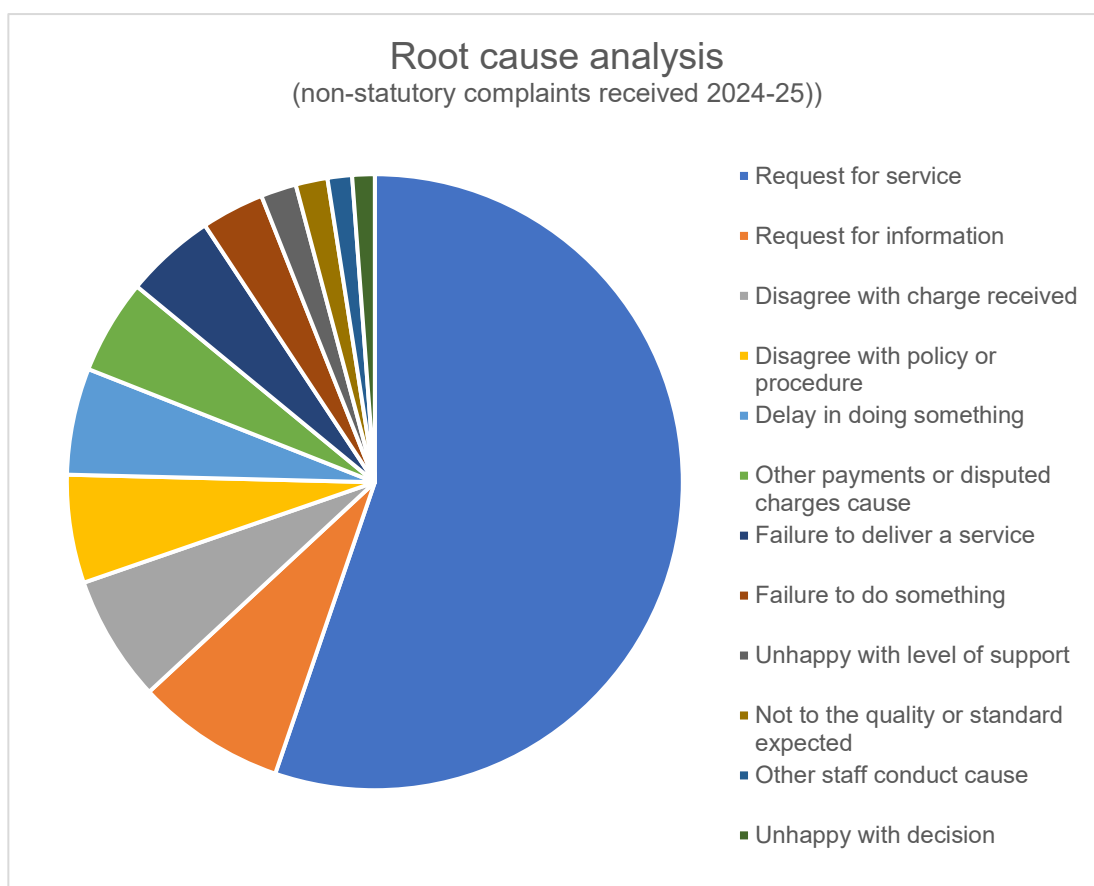
14. We cannot confidently calculate our escalation rates to the Ombudsman with real precision.
- Our figure of 33 is well below the LGSCO figure of 123 (calculated by excluding statutory complaints from the LGSCO raw figures). But the LGSCO figure includes complaints which have not completed our complaints procedure, and complaints which are not within LGSCO's jurisdiction (and are therefore likely to fall outside our complaints procedure).
  - LGSCO investigated and decided 30 complaints about Lewisham. This figure is much closer to our own figure, and the small discrepancy here is likely to be an issue of timing – the lag between when complaints are received, and when they are decided.
  - Using the figure of 33 gives an escalation rate of 20%, which suggests that 80% of complainants are satisfied with the stage 2 complaint outcome. We cannot make a direct comparison with previous years, because this is our first year without a stage 3.
  - But overall, the figures suggest that less than 1% of the complaints we receive at stage 1, become an LGSCO investigation. This is consistent with previous years.

## Themes and trends

15. The top ten areas of complaint have remained consistent for the past few years. It is worth re-iterating that the areas which receive the most complaints are those which deliver universal services.

Rank	Service area	Cases	%
1	Street Environment Services	1,530	31%
2	Revenues	1,180	24%
3	Commercial Operations and Development	629	13%
4	Housing Needs & Refugee Services	327	7%
5	Parks, Sport and Leisure	228	5%
6	Strategic Transport	224	5%
7	Highways	182	4%
8	Benefits	164	3%
9	Integrated Services & SEND	82	2%
10	Private Sector Housing Agency (PSHA)	47	1%

16. For the causes of complaints, by far the biggest root cause recorded is 'Request for service'. Further analysis has shown that 84% of these cases had the outcome 'Resolved upon receipt' or 'Not upheld'. This supports the view that we currently record as complaints many cases which should properly be recorded as an enquiry.
17. The pie chart below summarising the root cause of complaints excludes those causes which were recorded in less than 1% of cases.



18. About a third of complaints about delay were upheld, and a similar proportion of complaints about the level of support we provided. Beyond this, figures are too small to provide useful intelligence for the council overall. Individual services may benefit from analysing the root causes of the complaints they receive.

## Complaint-handling performance

### Stage 1 complaint-handling performance by directorate

19. Direct comparisons with previous years are not possible because of changes in directorate organisation. But the total percentage of on-time responses has improved from 80% in 2023-24 and 78% in 2022-23.

Directorate	Due	On time	%
Adult Social Care and Health	16	8	50%
Chief Executive	27	23	85%
Children and Young People	150	78	52%
Corporate Resources	1,395	1,274	91%
Housing	394	229	58%
Place	2,938	2,740	93%
<b>Total</b>	<b>4,914</b>	<b>4,349</b>	<b>89%</b>

### Stage 2 complaint-handling performance by directorate

20. Again, direct comparisons with previous years are not possible because of changes in directorate organisation. But the total percentage of on-time responses has improved from 64% in 2023-24 and 46% in 2022-23.

Directorate	Due	On time	%
Adult Social Care and Health	2	2	100%
Chief Executive	1	1	100%
Children and Young People	20	14	70%
Corporate Resources	13	11	85%
Housing	104	71	68%
Place	25	22	88%
<b>Total</b>	<b>162</b>	<b>121</b>	<b>75%</b>

## Outcomes

### Stage 1 complaints

21. There has not been a significant change in complaint outcomes from the previous year. 'Resolved at first point of contact' and 'Resolved upon receipt' tend to be used as complaint outcomes in high-volume service areas. Often these outcomes are recorded for cases which may not all qualify as complaints, as defined in our corporate complaints policy.

Stage 1 outcomes	2024-25	%	2023-24	%
<b>Upheld</b>	549	11%	504	12%
<b>Partly upheld</b>	450	8%	414	10%
<b>Not upheld</b>	1,924	39%	1,843	43%
<b>Resolved at first point of contact</b>	7	<1%	13	<1%
<b>Resolved upon receipt</b>	1,982	40%	1,473	35%
<b>No outcome recorded</b>	2	<1%	4	<1%
<b>Total</b>	<b>4,194</b>		<b>4,251</b>	

### Stage 2 complaints

22. The variation from the previous year is more significant at stage 2, where 45% of complaints were upheld or partly upheld in 2024-25, compared to 36% in 2023-24.

Stage 2 outcomes	2024-25	%	2023-24	%
<b>Upheld</b>	35	21%	23	20%
<b>Partly upheld</b>	39	24%	18	16%
<b>Not upheld</b>	89	55%	67	59%
<b>Withdrawn</b>	-	-	5	4%
<b>Total</b>	<b>163</b>		<b>113</b>	

23. Only 50% of the complaints which progressed to stage 2 had not been upheld at stage 1. Complainants do not have to give a reason for requesting a stage 2 review and even if their complaint was upheld at stage 1, they may be dissatisfied with the remedy, or feel that the stage 1 investigation did not cover all aspects of their complaint.

24. Stage 2 has also traditionally been viewed as the point at which a more detailed investigation of the complaint would take place. Our policy now requires a detailed investigation – if one is required – to be carried out at stage 1, making stage 2 a straightforward review, rather than a full investigation. We may see a short-term increase in the number of cases where stage 2 reverses the stage 1 outcome, as stage 1 complaint-handlers gain experience in implementing their training. But in the long-term, the figure should reduce and stabilise.
25. In around half the cases which progressed to stage 2 in 2024-25, the outcome did not change. In those where the outcome did change, this was usually a switch between upheld, and part upheld. Just under a third (29%) of complaints which were not upheld at stage 1, were upheld or partly upheld at stage 2. This indicates that in most cases the stage 1 investigation was not incomplete or flawed.
26. Sometimes the remedy for an upheld complaint will include compensation, which we calculate in accordance with LGSCO's [Guidance on Remedies](#). At present, services are not recording awards of compensation on iCasework in a way which allows us to collate the information into an overall figure. Recent training for complaint-handlers makes clear that this needs to change.

## Service improvements

27. We have limited information for 2024-25, because this pre-dates the training given to complaint-handlers about effective recording of learning from complaints. From the information we do have, the following service improvements have been put in place as a result of complaints:
  - Better communication about SEN travel assistance applications
  - More robust contingency plans to cover long-term staff absence
  - Improved information about support dogs provided to our security team
  - Changes to greeting messages on voicemail systems
  - Improved mapping software
  - Training for front-facing staff about managing difficult conversations.
28. It is likely that other service improvements were made as a result of the complaints we investigated, but we have been under-reporting this data. We expect to have better information for 2025-26.

## Refused complaints

29. The corporate complaints policy sets out the circumstances in which we may refuse to accept a complaint into the complaints procedure. In 2024-25 we rejected 178 complaints (less than 4% of complaints received), for the following reasons:

Reason for rejection	Number
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Complaint not for this organisation	69
Duplicate complaint	36
Customer refused to provide a name or address	25
Complaint subject to legal proceedings	14
Representative not authorised to act on behalf of client	8
Referred to Insurance and Risk team	8
Same complaint already dealt with at all stages of the procedure	7
Appeal not a complaint - Housing, Parking, School Admissions, Social Care etc	3
Complaint about council's legal or professional opinion	3
To be re-logged as an Information Request	2
Complaint about personnel matters	1
Complaint about an issue more than 12 months old	1
Complaint about council policy	1
<b>Grand Total</b>	<b>178</b>

## Quality Monitoring Findings

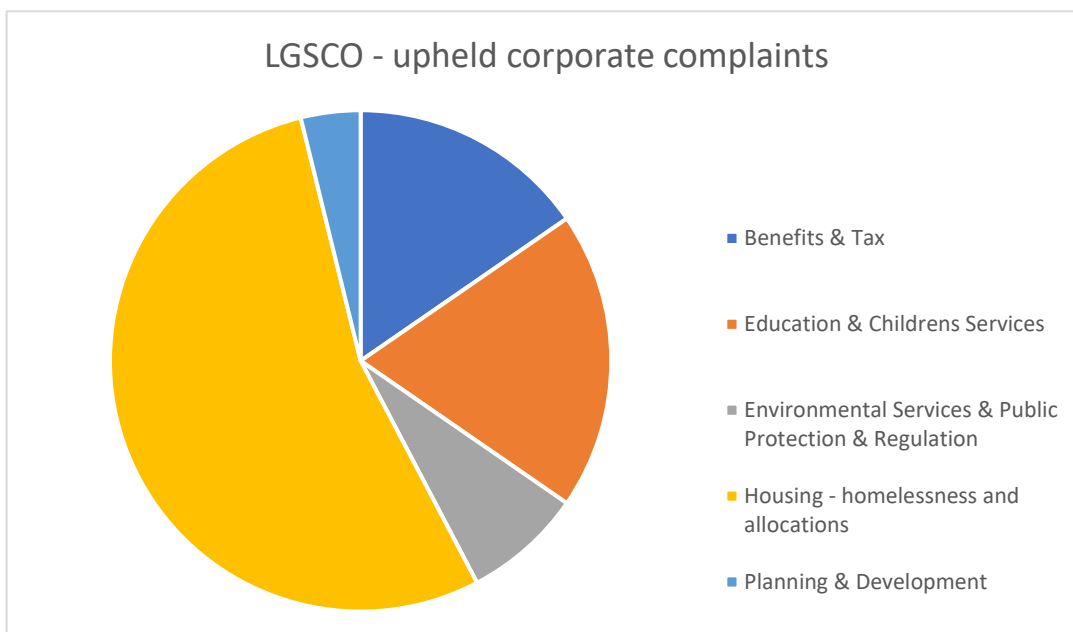
30. In October 2024 the Corporate Complaints and Casework team introduced quality monitoring. Each month the team randomly checks a proportion of corporate and housing complaints. The team reviews each case against the requirements of the relevant complaints policy, looking at content, outcome and timeliness. Between October 2024 and March 2025 we looked at 71 complaint responses; only 31% of these cases were considered satisfactory.
31. An assessment is currently under way for cases received in March 2025, to create a baseline for the quality of our complaint-handling before training was rolled out to complaint-handlers in May. We will then be able to measure improvements in the quality of our complaint-handling.
32. Going forward, we are expanding our quality checks to include reviewing the quality of the data recorded on iCasework for each case we check.

## Local Government and Social Care Ombudsman

33. The LGSCO annual letter and statistics are attached to the Annual Corporate Complaints report, as they include complaints which fall under the statutory procedures for adult social care and children's social care complaints. The commentary in this report is based on the figures for non-statutory complaints only, which have been extracted from the LGSCO figures.
34. Where there is a discrepancy with our own complaint records, we have used the data from LGSCO.
35. The outcomes for the 123 substantive corporate complaints – that is, excluding those contacts where LGSCO simply gave advice – which LGSCO decided this year were as follows:

Decision	Number
Closed after initial enquiries	52
Referred back for local resolution	41
Upheld	26
Not Upheld	4
<b>Total</b>	<b>123</b>

36. 'Closed after initial enquiries' means LGSCO did not investigate, usually because there was an alternative right of appeal, such as a tribunal, available to the complainant.
37. Complaints referred back for local resolution are those which have arrived at LGSCO prematurely, that is, before the council has had an adequate opportunity to investigate and resolve the matter. A large number here may indicate that the Council needs to take steps to make its complaints procedure more accessible. This is not a large number, but in any case, we have recently reviewed and improved the complaints landing page on our website.
38. LGSCO investigated 30 corporate complaints in 2024-25 and upheld 26 of them. The distribution across services is shown below:



39. Some complaints were upheld without detailed investigation, when LGSCO was satisfied that we had already remedied the complaint.
40. We paid compensation totalling £35,550 on cases upheld by LGSCO. In two cases LGSCO said we should continue to make a monthly remedy payment until the complainant was appropriately housed. It is not clear from our complaint records how much these ongoing payments totalled.

41. LGSCO made 18 service improvement recommendations for non-statutory complaints in 2024-25.
- 4 related to improving complaint-handling in environment and regulation, housing allocations, council tax, and SEN.
  - 7 required us to remind officers of the correct processes to follow in environment and regulation, housing allocations, SEN, school attendance, and homelessness.
  - 7 required us to review our policies or practice in service areas which included housing allocations, homelessness, planning, and SEN.
42. In July 2024 LGSCO published a public interest report about complaint reference [22 016 576 - Local Government and Social Care Ombudsman](#). LGSCO found multiple faults in how we had handled this homelessness case. The faults caused significant injustice, which was reflected in the payment recommendation of over £14,000. The [Housing Select Committee](#) considered the report, and the action plan developed to address the issues raised by the report, on 21 November 2024. LGSCO confirmed they were satisfied with our response to the report on 8 January 2025. However, we were late in complying with LGSCO's recommendations and LGSCO drew attention to this in their annual letter about our performance.

## Appendices

### Appendix 1

LGSCO code self-assessment

### Report authors and contact

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for and on behalf of the Executive Director for Corporate Resources David Austin

