

# Slough Borough Council

<b>Report To:</b>	Audit and Corporate Governance Committee
<b>Date:</b>	10th September 2025
<b>Subject:</b>	Local Government & Social Care Ombudsman (LGSCO) and Housing Ombudsman complaints and Annual Complaints Report 2024-2025
<b>Chief Officer:</b>	Sonia Khan, - Director of Strategy Change and Resident Engagement Sukdave Ghuman - Monitoring Officer
<b>Contact Officer:</b>	Allison Kennedy - Head of Customer Service
<b>Ward(s):</b>	All
<b>Exempt:</b>	NO
<b>Appendices:</b>	Appendix A: LGSCO Annual Review Letter May 2025 Appendix B: Summary of upheld LGSCO complaints received 1 April 2024- 31 March 2025 Appendix C: Housing Ombudsman Landlord report Appendix D: Statutory and Corporate Complaints Annual Report 2024-25 Appendix E: Local Government and Social Care Ombudsman Self-assessment Appendix F: Housing Ombudsman Self-assessment

## 1. Summary and Recommendations

1.1. This report sets out a summary of the upheld complaints determined by the Local Government and Social Care Ombudsman (LGSCO) and the Housing Ombudsman, as well as a copy of the annual statutory & corporate complaints during 2024-25.

### Recommendations:

1.2. Committee is recommended to:

- (a) Note the summary of upheld decisions by the Local Government and Social Care Ombudsman during 1st April 2024 - 31 March 2025 and the Housing Ombudsman Landlord Report (Appendix B and C).
- (b) Note the statutory and corporate complaints annual report 1st April 2024 – 31 March 2025 Appendix D.
- (c) Note the themes identified and the actions being taken to respond to these Appendix D.
- (d) Note the self-assessment against the LGSCO and Housing Ombudsman Codes as set out in Appendix E and F.

## **Reason:**

1.3. Where complaints are upheld by the LGSCO, they recommend ways for authorities to put things right when faults have caused injustice. Their recommendations try to put individuals back in the position they were in before the fault. The LGSCO also monitor authorities to ensure compliance with their recommendations. Appendix B includes LGSCO recommendations for each upheld complaint.

## **Commissioner Review**

This report is outside the scope for pre-publication commissioner review; please check the [Commissioners' instruction 5 to CLT to sign off papers](#) for further details.

## **2. Report**

2.1. Organisations should embrace complaints through increased transparency, accessibility, and complaint handling governance. Demonstrating that individuals are at the heart of its service delivery and good complaint handling is central to that. It is imperative that we learn from complaints data so that we continuously improve and get things right first time.

## **Options considered**

2.2. The council could report individual findings of maladministration on a case-by-case basis. This is not recommended as it does not provide an opportunity to identify themes, and learn from complaints, even when they are not upheld by the LGSCO.

2.3. By publicly reporting on complaints data and learning, the Committee has an opportunity to scrutinise how this data is used to inform the Council's risk management procedures and to ensure continuous improvement. This option is recommended as it allows the council to learn from complaints to continuously improve its services and increase resident satisfaction.

## **3. Background**

### **LGSCO data**

The Council implemented a new two stage corporate complaints process:

- At Stage 1 the Council will nominate an appropriate officer to respond to the complaint.
- At Stage 2 complaints which are not resolved at Stage 1 are reviewed by the relevant Director / Senior manager for the service the complaint is about.

3.1. If the complainant remains dissatisfied after going through the Council's corporate complaints procedure, they may escalate the matter to the LGSCO. Where the matter relates to complaints about social housing then it falls under the jurisdiction of the Housing Ombudsman (HO) instead of the LGSCO.

3.2. There are separate statutory processes in relation to social care complaints for Adult and Children's services (termed 'statutory social care complaints'). The latter are dealt with via Slough Children First as the functions are contracted out to that company in accordance with a direction of the Secretary of State for Education. Once the statutory procedure is exhausted the complainant has the right of recourse to the LGSCO.

3.3. The LGSCO reserves the right to accept and investigate a complaint even if it has not been through either our corporate or the statutory complaints procedures. This can occur when there are urgent issues (such as imminent homelessness), vulnerability, or if the complainant shows that they have complained to the council but have not received a response. However, in general the LGSCO expects complainants to utilise the internal complaints process first to give local authorities the opportunity to resolve the matter directly.

3.4. This report covers the reporting period: 1 April 2024 - 31 March 2025

3.5. Every July the LGSCO issues an annual review letter to every local authority which outlines the complaints and enquiries they have dealt with during the previous financial year. The annual letter and summary of upheld complaints received by Slough Borough Council for 2024-25 can be found in Appendix A and B.

3.6. Officers have reviewed the annual letters from the LGSCO and noted the following:

- In 2024-25, 10 out of 11 of the investigations conducted by the LGSCO were upheld, this equates to 6.2 upheld decisions per 100,000 residents. From the 69 complaints that were progressed to the LGSCO 84% (58) did not pass their test for an investigation.

3.7. The average upheld rate for all investigations has increased this year and the LGSCO explained that we may find that our organisation's upheld rate is higher than previous years. This means that comparing upheld rates with previous years carries a note of caution. Therefore, they recommend comparing this statistic with that of similar organisations (see below). It is also of note that the number of complaints investigated was low and therefore this has the potential to lead to misleading statistics when percentages are presented.

Authority and Population as of March 2021 (Census Day)	Total number of complaints received	Total number of complaints upheld after investigation	% of complaints investigated that were upheld
Bracknell Forest Council – 125,600	11	11	100%
Reading Borough Council - 174,200	15	10	67%
Slough Borough Council - 158,500	11	10	91%
West Berkshire Council Population - 161,409	10	7	70%
Windsor and Maidenhead - 153,900	15	13	87%
Wokingham Borough Council - 177,500	18	13	72%

3.8. Based on a total of 8 compliance outcomes for the period 1 April 2024 to 31 March 2025 the LGSCO was satisfied that the council had successfully implemented agreed recommendations.

3.9. It found in none of the cases investigated was a satisfactory remedy reached before the case reached the Ombudsman. As a result of the upheld investigations the council agreed to make 21 improvements (which can be found here: <https://www.lgo.org.uk/your-councils-performance/slough-borough-council/serviceimprovements>) to its services. Compliance was recorded in 8 cases in 2024/25, achieving a 100% compliance rate.

### **Housing Ombudsman Landlord Report**

3.10. The below table shows that the HO investigated three complaints. Out of these, 6 Findings were made, 5 of which were Maladministration. Also from these findings, 13 Orders were made with 4 recommendations found in Appendix C of the Audit and Corporate Governance Committee report. The full report can be found in Appendix C.

Housing Ombudsman	Determinations	Findings	Maladministration Findings	Orders made	Recommendations
Housing	3	6	5	13	4

3.11. The Regulator of Social Housing recently inspected the council and made a C3 judgement that it does not have assurance that housing complaints are addressed fairly, effectively, and promptly. There are serious failings in Slough BC's approach to housing complaint handling, as it is not meeting target housing complaint response times and there is no evidence of learning from housing complaints. There are also failings in its recording and monitoring of housing complaints. SBC is aware of these issues and had already set up a housing task force to implement improvements before the inspection. The judgement can be found at: <https://www.gov.uk/government/publications/slough-borough-council/slough-borough-council-00md-regulatory-judgement-25-june-2025>

### **Review of Complaints Policy against statutory codes**

3.12. The LGSCO launched a revised Complaint Handling Code ('the Code'), in February 2024. The purpose of the Code is to enable organisations to resolve complaints raised by individuals promptly, and to use the data and learning from complaints to drive service improvements. It will also help to create a positive complaint handling culture amongst staff and individuals. The LGSCO have issued the Code as "advice and guidance" for all local councils in England under section 23(12A) of the Local Government Act 1974. This means that councils should consider the Code when developing complaint handling policies and procedures and when responding to complaints, although full compliance is not expected until 2026. The council recently completed its self-assessment (see Appendix E) against the new LGSCO Complaint handling code. The council is not fully compliant with aspects of the Code and steps are being taken to address this as part of the Complaint workstream under the [Improvement and Recovery Programme](#).

3.13. In April 2024, the HO published its revised Complaint Handling Code, the council recently completed its annual self-assessment against the HO Complaint handling code (see Appendix F). **There has been significant progress made from the previous year showing 90% compliance with the code compared to 47% from the previous year.** The

main themes of non-compliance are around process, root cause analysis of complaints and embedding learning.

3.14. The areas of non-compliance link into the work being undertaken as part of the Complaints workstream under the Improvement and Recovery Programme and the work being carried out by our Transformation Team around complaints.

3.15. The table below shows a breakdown of the outcomes of LGCSO complaints decided over the last 3 years. Last year there was an increase of 22 complaints decided going to the LGSCO from the previous year. There was also an increase of 7 in the number of LGSCO cases investigated compared to the previous year.

LGSCO decision	Number of Complaints (% of total)						
	2022-23		2023-24		2024-25		
Investigated Upheld	11	15%		4	9%		10
Investigated Not upheld	2	3%		0	0%		1
No further action	59	82%		43	91%		58
<b>Total number of LGSCO complaints decided</b>	<b>72</b>	<b>100%</b>		<b>47</b>	<b>100%</b>		<b>69</b>

3.16. This trend appears in-line with the national picture; the LGSCO's Review of Local Government Complaints 2024-25 [Annual Review of Local Government Complaints 2024-2025](#) advised that they have received a record number of complaints during the year, exceeding 20,000 for the first time – this has resulted in a 16% increase in each of the past two years. Education & Children, Adult Care and Housing services continue to dominate their casework, accounting for 58% of the decisions they made.

### **Internal complaints data**

3.17. Slough Children First (SCF) the council's children's social care provider partner operates under two distinct complaints processes. These are Statutory Complaints and Corporate Complaints, both have three stages. SCF produces separate annual complaints report which is made publicly available via their website <https://www.sloughchildrenfirst.co.uk/who-we-are/complaints-and-compliments/>.

3.18. In the period 1st April 2024- 31st March 2025 the council received and investigated 819 complaints at stage 1, 141 at stage 2.

3.19. We also receive service requests which are not complaints. These are passed on and handled separately within specific service areas in the council. There were 1500 service requests handled via the complaints mailboxes in 2024/25 compared to 1198 in 2023/24.

3.20. The table below shows a breakdown of the number of complaints received by stages over the last 3 financial years. (Please refer to Appendix D for a detailed analysis of the Council's Statutory and Corporate Complaints 2024-25). This shows that the number of stage 1 and 2 complaints received has increased from the previous year.

	2022/23	2023/24	2024/25
Stage 1	839	720	819
Stage 2	78	78	141
Stage 3	5	1*	0
Total Complaints handled	921	852	960

\* The Corporate complaints procedure changed in August 2023 removing Stage 3.

3.21. Below is a breakdown of the top 10 complaint departments/areas, timeliness and uphold rate. Of the stage 1 complaints received the three areas with the highest volume of complaints were Housing Repairs 275 (33%), SEND and Inclusion 116 (14%) and Housing Services 105 (13%).

Stage 1 Complaints	Complaints received	Complaints Close	Complaints Closed within the timescale	% Closed within the timescale	% Partially or fully upheld
Housing Repairs	275	274	64	23%	66%
SEND & Inclusion	116	116	55	47%	89%
Housing Services	105	102	58	55%	53%
Revenues & Benefits	72	70	62	86%	45%
Neighbourhood services	58	58	19	33%	68%
Adult Social Care	55	55	24	44%	63%
Environmental Services	26	26	18	69%	61%
Planning	23	22	17	72%	35%
Resilience	17	17	9	53%	56%
Customer Services	13	13	12	92%	50%

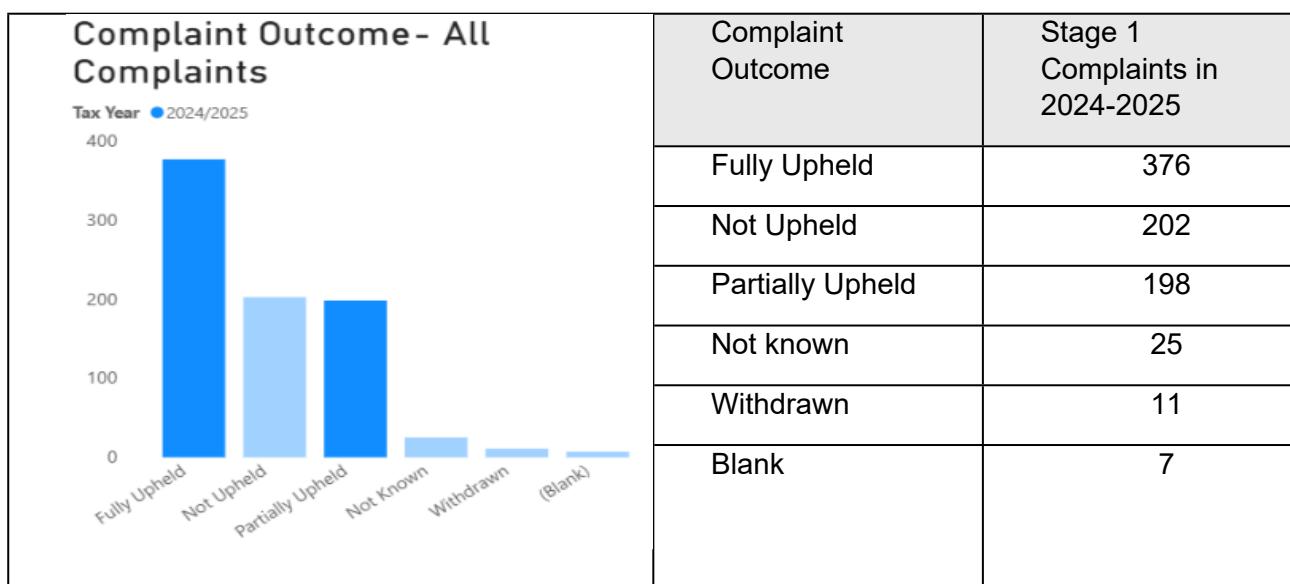
\*\*Adult Social Care statutory complaints have one stage, thereafter complainants may choose to progress their complaint to the LGSCO.

3.22. The 3 themes regarding the root cause for complaints continue to be communication, delays and quality of service. The root causes are broadly centred on;

- Communication- A high number of complaints due to lack of communication have been Upheld or Partially Upheld. These are generally between officers, teams, or departments within the Council. Where it is established, the council accepts fault, and both acknowledge and apologise for any inconvenience caused.
- Delays & Timeliness- Most complaints relating to timeliness have been Upheld. This category relates to the time taken to carry out a service. The Council always seeks to avoid delays in service delivery; there are occasions where we need to reprioritise and give attention to putting things right in a timely way and seek early resolution to residents' concerns.

- Quality- These complaints relate to services provided directly by Council staff or relate to the quality or conduct of staff employed by service partners. Quality issues within any area services are addressed through the relevant line managements. Quality issues with provider services are addressed through the Council's contract management procedures.

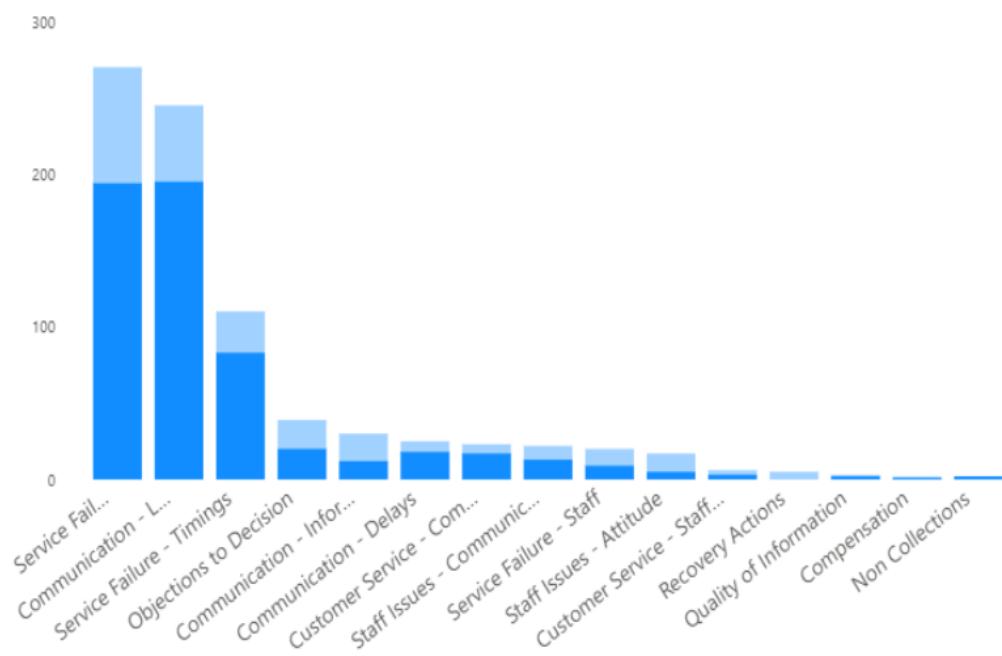
3.23. The table below shows the complaint outcome for all upheld stage 1 complaints 2024-25 along with the main contributing root cause. 70% of complaints received were partially/fully upheld, this is an increase of 2% from the previous year. The Council is aiming to resolve complaints at the earliest opportunity and therefore upholding complaints at Stage 1 should not necessarily been seen as a negative outcome, however members should consider whether the learning is leading to improved service delivery in the future.



3.24. The root cause for fully and partially upheld complaints (574) are detailed in the chart and table below.

## Complaints by Root Cause

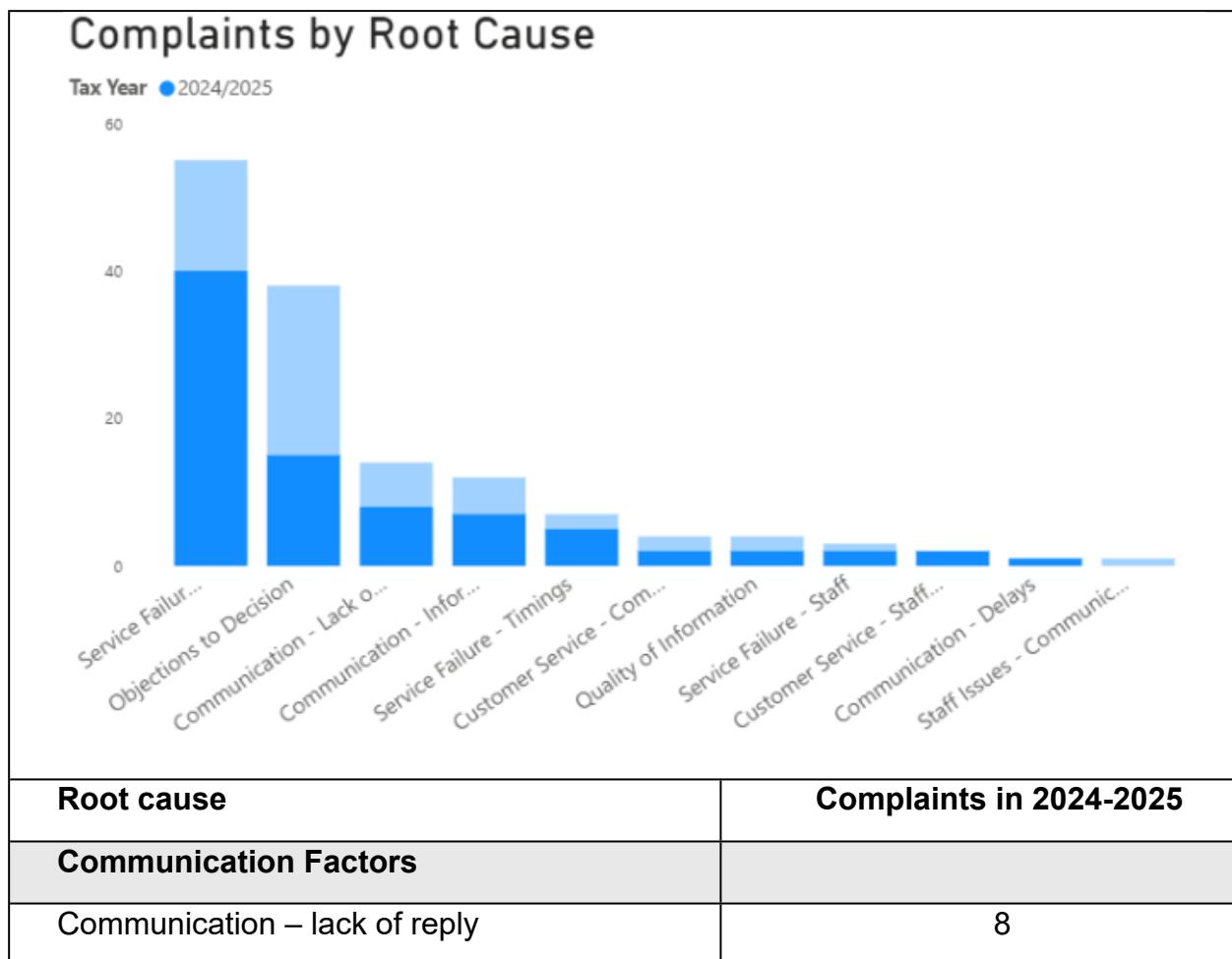
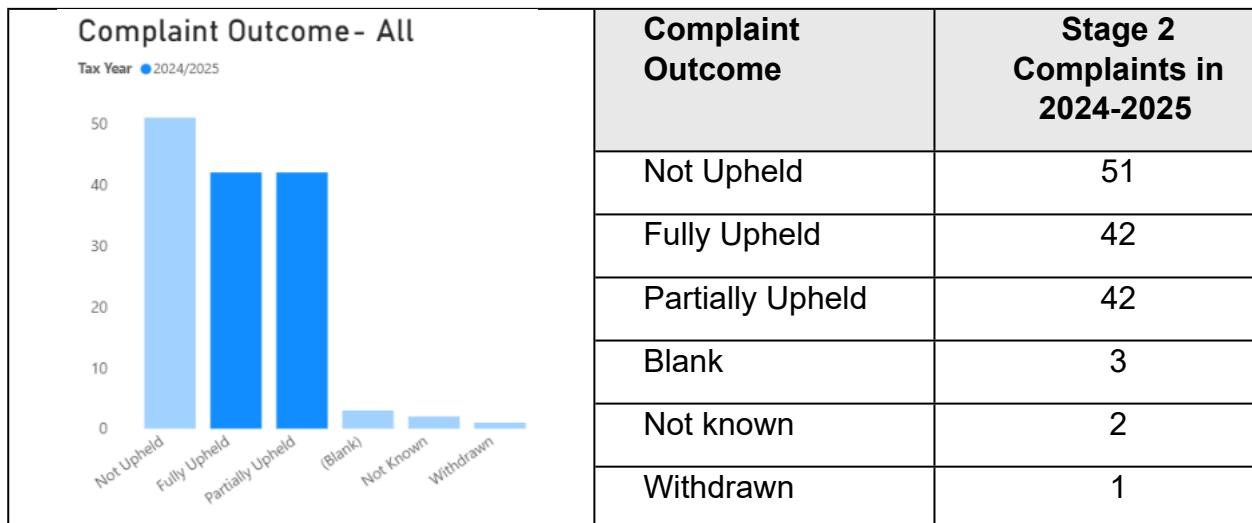
Tax Year ● 2024/2025



Root cause	Complaints in 2024-2025
<b>Communication Factors</b>	
Communication – lack of reply	195
Communication – delays	18
Communication – Customer Services	17
Communication Information given	12
<b>Service Factors</b>	
Service failure – Quality of work	194
Service failure – timings	83
Service failure – staff	9
<b>Staff Factors</b>	
Staff Issues – Attitude	5
Staff issues- communication	13
<b>Other Factors</b>	
Objections to decision	20
Recovery Action	3
Quality of Work	2
Non Collection	2
Compensation	1
<b>Total</b>	<b>574</b>

3.25. There were 141 stage 2 complaints. The top 5 departments were Housing Repairs 37, SEND 29, Housing Services 20, Housing Management 17 and Revenues and Benefits 13. 41% were responded to on time with the average response time of 36 working days.

3.26. The table below shows the complaint outcome for all stage 2 upheld complaints 2024-25 along with the main contributing root cause. 60% of complaints received were partially/fully upheld, this is an increase of 5% from the previous year.



Communication – delays	1
Communication – Customer Services	2
Communication Information given	7
<b>Service Factors</b>	
Service failure – Quality of work	40
Service failure – timings	5
Service failure – staff	2
<b>Other Factors</b>	
Objections to decision	15
Quality of Information	2
Staff Issues – Communication	2
<b>Total</b>	<b>84</b>

#### **4. Learning and improvements**

4.1. Some of the learnings we derived from complaints resulted in; changes to processes and procedures, additional training where a need was identified, feedback to staff individually and in team meetings, reminders to staff and partners of Standard Operation Procedures, adjustments to working practices, improvements to contract management, and more transparency and management of customer expectations around service delivery and capacity.

The council's aim is to prevent replies to service requests / e-forms received escalating to a complaint.

- Delays in departmental response timings require improvement so that services are offering timely responses, to prevent a poor customer journey, reputational damage and requests for an escalation of a complaint.
- Council wide it is noted that learning from complaints and embedding this into service delivery as well as consideration of remedies to resolve a complaint in the first instance are areas for improvement.

4.2. Part of the complaints process is learning what the root cause of the complaint and recognising the learning. The Learning is requested on fully/ partially upheld complaints which becomes part of the complaint file.

4.3. Our focus is to ensure that we embed a positive complaint handling culture within the council and that complaints receive a timely and complete resolution and that learning from complaints is embedded into our continuous service improvement. Prevention is key and we are identifying and prioritising the underlying causes of poor service delivery as part of our service improvement plans.

4.4. The timeliness of complaint investigations, especially at Stage 1, is below the standard we expect, and we will be addressing this further throughout 2025/26 by providing training and guidance on the Ombudsman code of practise and improved reporting to aid

services on their overdue and outstanding complaints. This will provide Information and support to senior officers who manage Complaints for their service areas.

4.5. The Corporate Complaints team are working closely with SEND and Housing to provide additional complaint handling support because of the increased volume of complaints to these areas.

## 5. Financial implications

4.6. Payments of a financial remedy made from complaints to the council in 2024/25 totalled £2,440.

4.7. Payment of financial remedy made on individual cases as agreed with the LGSCO has grown from the previous year from £11.300 to £35,260 as shown in the table below.

4.8. The HO has seen a significant rise in recommended remedies over the last three financial years. In 2023–24 total financial remedies recommended was £4.6 million, this was five times higher than the previous year.

4.9. To note the council had zero determinations from the HO in 2023/24. In 2024/25 there were 3 cases upheld.

	2023/24 (number of cases)	Total £ 2024/25 (number of cases)
Corporate Complaint payments for stage 1 and stage 2 complaints	£310 (3 cases)	£2440 (18 cases)
LGSCO Payments	£11,300 (3 cases)	£35,260 (10 cases)
Housing Ombudsman	N/A	£1,920 (3 cases)
<b>Total</b>	<b>£11,610</b>	<b>£39,620</b>

## 4.10. Legal implications

4.11. The LGSCO is the independent body responsible for investigating complaints made against local authorities where it is alleged that there has been maladministration causing injustice. Under the Local Government Act 1974, the LGSCO is responsible for investigating complaints against council and some other authorities, investigating complaints about adult social care providers from people who arrange or fund their own adult social care and for providing advice and guidance on good administrative practice.

4.12. The expectation is that a complainant will utilise a local authority's complaints process prior to referring the matter to the LGSCO, although the LGSCO can dispense with this requirement in specific cases. Complaints can be made by a member of the public, their authorised representative, a personal representative of a deceased person or a person deemed suitable to act on behalf of a member of the public if that person is unable to authorise them.

4.13. The LGSCO has the power to make recommendations to a local authority following a complaint on how to improve its services and to put things right for the complainant. The

recommendations are not mandatory, and the local authority does not have to accept or follow them. Remedies recommended by the LGSCO can include an apology, financial compensation, a review of procedures, staff training, and reconsideration of a decision and payment of money where this should have been paid.

4.14. Maladministration is not defined in the legislation; however, case law has held that it includes bias, neglect, inattention, delay, incompetence, ineptitude, perversity, turpitude and arbitrariness. Examples of maladministration include excessive or unreasonable delay, making misleading or inaccurate statements, failing to follow a specified procedure, failing to consult or liaise, failing to provide information when requested to do so, not keeping adequate records, and failing to investigate or reply to a query from a member of the public. The LGSCO is concerned with the way the decision was reached, as opposed to the actual decision.

4.15. Personal injustice can include the time and trouble involving in pursuing a complaint against a public body, the loss of a right or service, costs associated with pursuing the complaint and inconvenience, worry, distress, and hurt feelings.

4.16. Certain matters are outside the remit of the LGSCO. These include decisions where there is a statutory right of appeal, situations where the complainant has had a remedy by way of court proceedings and where the complainant has failed to make a complaint within 12 months of the matter complained of (although there is discretion to extend this time limit).

4.17. In February 2024, following a period of consultation, the LGSCO launched the Complaint Handling Code for councils, setting out a clear process for responding to complaints effectively and fairly. The code is released as “advice and guidance” for all local councils in England under section 23(12A) of the Local Government Act 1974. This means that councils should consider the Code when developing complaint handling policies and procedures and when responding to complaints. If a council decides not to follow the code, we expect it to have a good reason for this. The code is expected to become a formal part of LGSCO processes from April 2026.

4.18. In April 2024 the HO Service Complaints Handling Code became statutory, meaning landlords are obliged by law to follow its requirements. There is a legal duty placed on the Ombudsman to monitor compliance with the Code. This means landlords will need to submit their self-assessment annually to the Ombudsman. The timing of the annual submission to the Ombudsman has been aligned with the Regulator of Social Housing’s requirements for the publication and submission of Tenant Satisfaction Measures (TSM) outcomes. For landlords with over 1,000 homes this was 30th June 2024. The self-assessment must also be published on their websites so that residents are able to easily access it. Both codes are aligned with each other and based on unified principles

4.19. The Council has a best value duty and statutory guidance has been issued setting out best value themes. For each theme there are examples of characteristics of a well-functioning authority. For Governance, this includes lessons being learned from complaints and under Service Delivery, that the authority has an accessible and effective complaints process and provides appropriate redress. A high rate of upheld complaints by the Ombudsman and the lack of an action plan to address areas of concern is seen as an indicator of potential failure.

#### **4.20. Risk management implications**

4.21. Complaints can be an essential means by which the Council assures the quality of council service. By listening to complaints and looking at learning, taking improvement action

where necessary, the Council minimises the risk of non-compliance with legal requirements as well as financial loss and ensures improved customer satisfaction.

#### **4.22. Equality implications**

4.23. As part of the review process, we would be looking to seek a mechanism for capturing equality data on protected characteristics to look at complaint issues through that lens.

4.24. Section 149 of the Equality Act 2010 sets out the Public-Sector Equality Duty which requires a public authority (or those exercising public functions) to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not foster good relations between persons who share a relevant protected characteristic and persons who do not.

4.25. Procurement implications: None

4.26. Workforce implications: None

4.27. Property implications : None

4.28. Background Papers: None.