

Complaints Handling Annual Report

2024-25



Introduction

At Moray Council, we aim to provide the highest level of service however there are times when we don't meet the expectations of our customers. When this happens, it's important we learn from the complaints we receive and improve our service delivery.

The Scottish Public Services Ombudsman (SPSO) is the responsible body for complaints handling for the public sector in Scotland. Their Model Complaints Handling Procedure (MCHP) defines how they expect complaints to be dealt with. In line with this, all complaints we receive are managed under the two Stage Complaints Handling Procedure:

Stage 1 - Also known as **Frontline Resolution**

These complaints should be straightforward. A Stage 1 complaint could mean immediate action to resolve the matter. These complaints should be answered within 5 working days. Most complaints should be dealt with at Stage 1.

Stage 2 – Also known as **Investigation Stage**

A Stage 2 complaint may be a concern that has not been successfully resolved at Stage 1 and is therefore escalated or refers to a matter that is more complex and requires a full and detailed investigation. These complaints should be answered within 20 working days.

We aim to resolve as many complaints as possible at Stage 1, however, if a customer remains dissatisfied following the 2 Stage process, we advise how complaints can be passed to the SPSO for further consideration.

To ensure we handle complaints effectively, our Complaints Officer conducts regular reviews of all received complaints and works closely with our Complaint Administrators. We also provide ongoing training sessions for Services and Elected Members to enhance understanding of the complaints process and promote best practice across the organisation.

Complaints Performance

All complaints are recorded on our Complaints Management System. Details are shared with our Corporate Leadership Team and Heads of Service on a quarterly basis and with our Service Committees every six months. Our Complaints Officer also holds regular meetings with Complaints Administrators and, at a national level, attends the quarterly meetings of the Local Authority Complaint Handlers Network (LACHN).

As part of a revised MCHP issued on 1 April 2021, local authorities are required to record and publish complaints performance annually against 4 Key Performance Indicators (KPIs). This report details how we performed against these KPIs between 01 April 2024 and 31 March 2025 and provides examples of changes introduced due to the complaints we have received. For comparison purposes, we have also included our performance from the previous two years and the latest national data for Scotland.

Indicator 1: Total number of complaints received (including complaints per 1,000 population)

This indicator records the total number of complaints received at both Stage 1 and Stage 2. To allow for consistent benchmarking across all local authorities in Scotland, the figure per 1,000 population is included.

Table 1: Complaints received including per 1,000 population

	Moray Council			Scotland
	2022-23	2023-24	2024-25	2024-25
Total Complaints Received (Stage 1 and Stage 2)	593	747	761	49,481
Population	96,410	94,280	94,670	4,587,310
Complaints per 1,000 population	6.15	7.92	8.04	10.79

(2024-25 population based on Mid-Year Estimates 2023. Totals for Scotland based on responses received by LACHN as of 15 September 2025)

During 2024-25, we received 761 complaints: an increase of 14 (2%) against the previous year and 168 (28%) since 2022-23. Although complaints have risen to 8.04 per 1,000 population, we remain well below the national average of 10.79.

Looking further at the complaints received in 2024-25, Housing and Property Services recorded 285; an increase of 105 (58%) against the year before. Environmental and Commercial Services complaints fell by 17 (6%) to 279.

Table 2: Number and % of Total Complaints received by Department

Department	2022-23		2023-24		2024-25	
Housing and Property Services	191	32.2%	180	24.1%	285	37.5%
Environmental and Commercial Services	191	32.2%	296	39.6%	279	36.7%
Education	64	10.8%	80	10.7%	52	6.8%
Economic Growth and Development	23	3.9%	37	5.0%	27	3.5%
Adult Care (Health and Social Care Moray)	22	3.7%	26	3.5%	27	3.5%
Financial Services	36	6.1%	38	5.1%	27	3.5%
Children and Families and Criminal Justice (Health and Social Care Moray)	29	4.9%	44	5.9%	26	3.4%
Education Resources and Communities	14	2.4%	24	3.2%	17	2.2%
Governance, Strategy and Performance	21	3.5%	20	2.7%	17	2.2%
Chief Executive	0	0.0%	0	0.0%	4	0.5%
HR, ICT and Organisational Development	2	0.3%	2	0.3%	0	0.0%
Grand Total	593	100.0%	747	100.0%	761	100.0%

For Housing and Property, the large increase in 2024-25 can be linked to three main areas: Repairs/Capital/Planned Maintenance, Allocations and Housing Estate Management.

Table 3: Housing and Property Services – Most Common Complaints 2024-25 (with previous years comparison)

Housing and Property	2022-23	2023-24	2024-25
Repairs/Capital/Planned Maintenance	130	111	191
Allocations	14	7	24
Housing Disputes	6	17	19
Complaint Against Staff	17	17	19
Housing Estate Management	14	11	18
Other	1	8	5
Strategy & Development	3	1	3
Asset Management	0	0	3
Homelessness	3	5	1
Process/Procedure	1	1	1
Housing Support	2	1	1
Estates	0	1	0
Grand Total	191	180	285

The increase in complaints related to Repairs/Capital/Planned Maintenance coincides with a significant escalation in maintenance activity across Moray to deliver the Energy Efficiency Standard in Social Housing (EESH). Investment in this programme has risen from £16.6million in 2023/24 to £24.4 million in 2024/25 with a schedule of work involving multiple teams and external contractors. Investigations into the complaints received, identified poor

communication with tenants as a recurring issue. In addition, a rise in reported cases of damp and mould and inconsistencies in the handling of repairs under the Right to Repair element of the Housing (Scotland) Act 2001 have also attributed to the higher rate of complaints.

To address this, compulsory staff training has been introduced (see Learning from Complaints section), and a Repair Improvement Plan is in development. This will include revised procedures around communication and reinforce the correct approach when handling repairs and reports of damp and mould.

Following an increase in complaints last year, Environmental and Commercial Services reviewed their complaint handling procedures. Improvements identified for Waste Management, Open Spaces and Road Maintenance were implemented in February 2025. These changes have already shown positive results, and it is anticipated this trend will continue in future reporting.

Indicator 2: Number and Percentage of complaints at each stage that were closed in full within set timescales of 5 and 20 working days

The MCHP requires complaints are closed within 5 working days at Stage 1 and 20 working days at Stage 2. While the aim is to manage complaints as quickly as possible, the main consideration must always be to deliver a quality decision based on facts and evidence.

Table 4: Complaints Closed

	Moray Council			Scotland
	2022-23	2023-24	2024-25	2024-25
Stage 1	466	586	611	40,900
Stage 2	80	123	129	4,331
Escalated Stage 2	26	26	25	2,555
Total	572	735	765	47,786

NB: Complaints Received (Table 2) and Complaints Closed (Table 4) may differ due to complaint received but not closed in the reporting period.

Table 5: Number and Percentage of Complaints at each Stage that were closed in full within set timescales

	Moray Council						Scotland	
	2022-23		2023-24		2024-25		2024-25	
	No. closed within set timescales	% closed within set timescales	No. closed within set timescales	% closed within set timescales	No. closed within set timescales	% closed within set timescales	No. closed within set timescales	% closed within set timescales
Stage 1	377	81%	494	84%	518	85%	28,222	69%
Stage 2	54	68%	61	50%	51	40%	2,825	65%
Escalated Stage 2	8	31%	4	15%	7	28%	1,800	71%
Total	439	77%	559	76%	576	75%	32,847	69%

During 2024-25, the proportion of Stage 1 complaints closed on time rose to 85%, significantly above the national average of 69%. Performance of Escalated Stage 2 complaints within target also improved, however the proportion of Stage 2 complaints closed on time fell and both were well below the reported Scottish averages. Overall, we continue to resolve around three quarters of all complaints within MCHP targets, a rate that remains well above the national average.

Indicator 3: Average time in working days for a full response to complaints at each stage

This indicator details the average time in working days taken for a full response to be provided to a complaint at each stage.

Table 6: Average Response Times (Working Days)

	Moray Council			Scotland
	2022-23	2023-24	2024-25	2024-25
Stage 1	6.26	5.36	5.42	8.60
Stage 2	27.45	27.92	31.83	19.90
Escalated Stage 2	28.73	32.77	29.64	19.00

Despite a slight increase in our average response time for Stage 1 complaints, we continue to perform well against the national average of 8.6 days. There has been some improvement with the average time taken to close an Escalated Stage 2 complaint however, both Stage 2 and Escalated Stage 2 complaints remain significantly above target and the Scottish average.

Late complaints often occur due to the complexity of the case being considered. Delays can also occur due to holiday periods, the number of services involved and if any legal mandates or advice is required. With Child Friendly Complaints, there is also a legal requirement to seek the views of the child involved before an investigation can progress.

To limit late complaint handling, the Complaints Officer regularly monitors complaint reports to Administrators and Heads of Service and delivers staff training and guidance where required.

Indicator 4: The outcome of complaints at each stage

Once a complaint investigation is complete, we must provide the customer with an explanation of the findings and confirm the outcome category as one of the following:

Upheld – when a complaint is found to be true or is confirmed.

Partially Upheld - where several issues have been raised and some, but not all, are upheld.

Resolved - where a complaint includes several issues, but we manage to agree an outcome without the need to investigate and respond on each separately.

Not Upheld - when a complaint is found to be untrue or where a reasonable standard of service has been provided.

Indicator 4 reports the number and percentage of our complaints closed at each stage against the outcome decision.

Table 7: The outcome of complaints at each Stage

	Moray Council						Scotland	
Stage 1	2022-23		2023-24		2024-25		2024-25	
Not Upheld	202	43%	276	47%	213	35%	13,888	34%
Partially Upheld	36	8%	51	9%	56	9%	7,121	17%
Upheld	212	45%	255	44%	325	53%	13,453	33%
Resolved	16	3%	4	1%	17	3%	6,438	16%
Total Closed at Stage 1	466		586		611		40,900	
	Moray Council						Scotland	
Stage 2	2022-23		2023-24		2024-25		2024-25	
Not Upheld	39	49%	78	63%	54	42%	2,323	54%
Partially Upheld	22	28%	24	20%	52	40%	1,092	25%
Upheld	19	24%	19	15%	23	18%	688	16%
Resolved	0	0%	2	2%	0	0%	228	5%
Total Closed at Stage 2	80		123		129		4,331	
	Moray Council						Scotland	
Escalated Stage 2	2022-23		2023-24		2024-25		2024-25	
Not Upheld	10	38%	5	19%	12	48%	1,319	52%
Partially Upheld	13	50%	12	46%	10	40%	537	21%
Upheld	3	12%	8	31%	3	12%	488	19%
Resolved	0	0%	1	4%	0	0%	211	8%
Total Closed at Esc. Stage 2	26		26		25		2,555	

NB percentages may not total 100% due to rounding

In 2024-25, a high proportion of our Stage 1 complaints were closed as Upheld: 53% against a national average of 33% while Stage 2 Partially Upheld complaints doubled to 40% compared to 25% nationally. Escalated Stage 2 complaints that were Not Upheld rose to 48%.

We also continue to have a lower proportion of complaints closed as Resolved. The option to close a complaint as Resolved (introduced in 2021) covers complaints where a resolution is agreed without the need to investigate each area. To ensure this category is applied correctly, our Complaints Officer regularly monitors Resolved complaints. If required, complaints are investigated fully, resulting in specific outcome of Not Upheld, Upheld or Partially Upheld being applied. Previous discussions with the Local Authority Complaint Handlers Network confirmed this level of monitoring is not routine for others and is perhaps why Resolved complaints recorded by Moray Council are much lower.

SPSO Complaints

If a complainant remains dissatisfied following the 2 Stage process, their complaint can be passed to the SPSO. The SPSO provide feedback and, if required, recommendations to help councils learn and improve. When recommendations are made, the council must act within a specified time and provide evidence that demonstrates the learning and improvements taken.

During 2024-25, 16 complaints relating to Moray Council were considered by the SPSO. Good complaint handling was noted for 11 and only 9 minor feedback points raised for others, to be passed to the relevant departments. An annual report covering complaints made to the SPSO will be discussed at the Audit and Scrutiny Committee meeting on 19 November 2025.

Child Friendly Complaints

On 16 July 2024, the United Nation Convention on the Rights of Children (UNCRC) (Incorporation) (Scotland) Act 2024 was incorporated into domestic law in Scotland. This Act ensures that children's rights are central to policy and decision making and that their needs are met by public service complaints procedures.

Child Friendly Complaints can be made by a child, a parent reporting an issue on behalf of a child or a parent or child reporting an issue that can impact a child. In all cases, we are required to seek the views of the child. To ensure we do this correctly, we follow the Child Friendly Complaints Handling Principles and Child Friendly Complaints Handling Procedure developed by the SPSO. More information about these can be found on the SPSO website - <https://www.spsso.org.uk/child-friendly-complaints>

Learning from Complaints

Complaints are a valuable source of information; they provide us with the opportunity to identify trends or emerging issues and develop and improve our service delivery. Some examples of changes we have implemented due to complaints in 2024-25 are provided below.

Right to Repair

Following investigations into complaints around Housing Repairs, a gap in staff knowledge of qualifying repairs and the Council's obligations under the Right to Repair element of the Housing (Scotland) Act 2001, was identified. To address this, compulsory staff training was developed and delivered to all staff who manage, schedule, approve and inspect repairs within Housing & Property. Policy and Procedures and Contact Centre scripts were also reviewed. Going forward, staff knowledge and any training requirements, will be discussed regularly as part of Team meetings, 121s and the Council's formal staff development programme.

Environmental & Commercial Services

With complaints increasing last year, a comprehensive review was undertaken of all Environmental & Commercial Services complaints. This included identifying best practice with other authorities via the Local Authority Handlers Network (LACHN) and improvement opportunities were identified within Waste Services, Open Spaces and Road Maintenance. Procedures will continue to be reviewed where necessary.

Children & Families

A revised communication policy relating to Fostering & Adoption Panel meetings should now ensure attendees are aware of the purpose of the Panel and how meeting feedback can be provided.

Education

Improved procedures relating to appropriate handling of medication are now in place while the need for correct recording and timely sharing of information has been reinforced with schools.

Council Tax

Online Council Tax Services have been improved to ensure availability of accurate payment and statement information. Streamlining this service will continue as part of the latest Financial Services Service Plan.

Catering Services

The Adapted Diet procedure has been reviewed and staff retrained on allergies to ensure the correct process is used and risk reduced.

Customer Satisfaction

In December 2021, as part of our plans for recovery and renewal from the Covid pandemic, we replaced paper copies of our survey with a link to an online questionnaire, sent to those supplying an email address. In 2024-25, 673 links to our survey were issued resulting in 87 responses and a return rate of 13%. This is a slight improvement on recent years (with 8% recorded in 2022-23 and 12% in 2023-24) and is comparable with the response rate in 2021-22 when paper surveys were issued. Alternative methods, within available resources, which may increase responses are kept under review however low response rates to complaint surveys are evident nationally.

Our survey requests feedback on the process of dealing with a complaint rather than the complaint outcome. In 2024-25, a high proportion of those responding to our survey said they found it easy to make their complaint and most agreed they had the opportunity to fully explain all areas of the complaint. Most also stated the response they received was easy to understand and following Administrator training last year, more people in 2024-25 believed all points of the complaint were covered. We do however still need to ensure we communicate better around timescales and the next stages of a complaint.

Conclusion

We are committed to learning from the views and experiences of our customers. To do this, we aim to record complaints accurately and adhere to the Complaints Handling Procedure. Where a complaint is closed as upheld or partially upheld, learning and improvement opportunities are identified to improve service provision. This can lead to a change in process or policy to prevent or reduce the likelihood of similar complaints occurring.

This Annual Report complies with the SPSO's requirement to publish our complaints performance against their 4 key performance indicators. It also highlights some of the recent changes we've made due to the complaints we've received. We will continue to welcome customer feedback and work towards providing the best service possible.

Contact Us

For more information on our complaints procedure, or to make a complaint via our complaints e-form, visit www.moray.gov.uk/complaints. For more detailed advice or to request a copy of the procedure in another format contact 01343 543451 or email complaints@moray.gov.uk.