

# Annual Report 2015

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The post of Service Complaints Commissioner (SCC) was created by the Armed Forces Act 2006 with a remit covering any Service complaint made after 1 January 2008. The Commissioner's role was to provide a rigorous and independent oversight of the Service complaints (SC) system and to report annually on the to Parliament. She was supported by the Office of the Service Complaints Commissioner (OSCC).

In March 2015, the Armed Forces (Service Complaints and Financial Assistance) Act gained Royal Assessment and provided for the Commissioner's role to change to that of an Ombudsman. These changes came into force on 1 January 2016.

While this report is prepared by the Service Complaints Ombudsman, it reports on the work undertaken by the Service Complaints Commissioner and her Office under the arrangements in place from 1st January to 31st December 2015.

## Our Aims

To ensure all Service men and women have confidence in the complaints system and are treated properly, by:

- providing an alternative pathway to raise a Service complaint with the chain of command;
- holding the Services to account for fairness, effectiveness and efficiency in their operation of the complaints system;
- working with the Ministry of Defence, including the single Services, to see that lessons are implemented swiftly and efficiently; and,
- accounting publicly to Parliament.

## Our Values

- Independence
- Integrity
- Impartiality

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# Message from the Ombudsman

Dear Secretary of State,

I am pleased to send you my Annual Report for 2015 which details the work undertaken by the Service Complaints Commissioner and the work of the Services in dealing with Service complaints in that same year.

As the role of the Service Complaints Commissioner came to a close at the end of 2015, the focus of my report is on transition to the role of Service Complaints Ombudsman. This report discusses the work that has been undertaken to ensure that my office and the Ministry of Defence are ready to move to the new system and offers my thoughts on what we must each do to ensure success. I am delighted with the progress that has been made in this respect and the spirit of cooperation with which this work has been undertaken. I am confident that my office is ready to meet the challenges we will face in the coming year.

Although the focus is on looking forward, I am grateful for the contribution from Dr Atkins to the “Looking Back” section of my report, giving a historic perspective on Service complaints from 2008-14. I personally must also reflect on the past year, and I have to report that the Service complaints process is still not efficient, effective or fair.

The time taken to resolve complaints is still the biggest area of concern. Although there has been considerable effort to reduce the number of outstanding complaints, there are still live complaints in the system that are up to, and in some instances over, 7 years old. Although some improvement was seen, all Services remain below the target agreed in 2013 to close 90% of complaints within 24 weeks – across the three Services this was true for only 47% of complaints. In some cases there is of course just cause for the delay, but in many cases the delay is inexcusable and represents Service men and women – complainants and respondents alike – who have been failed by their employer.

I recognise that one of the main reasons for these delays was the structure of the process and that this has been addressed by the implementation of the new arrangements from 1 January 2016. However there are other systemic issues that contribute to delay. For

example, a traditionally risk averse approach to the way Commanding Officers handled complaints, or misguided loyalty to the reputation of the Service rather than addressing the needs of the individual Service person who has made a Service complaint.

I am pleased to say that in addition to the work undertaken to resolve individual complaints, these systemic issues are also being addressed by the Services and the resulting changes should generate future improvements in the handling of complaints. This was already beginning to show in 2015. The treatment of Servicewomen in the Armed Forces is a major area of concern and I am pleased to see the work the Services are doing to tackle this, particularly within the Army where the problems appear to be most acute. Proportionately more women feel moved to make a Service complaints than their male colleagues do, but I have found it even more alarming to learn just how many women have felt they needed to tolerate unacceptable behaviour without feeling able to complain.

During the last year, I have conducted a number of visits at home and abroad, with this being a common theme that has arisen during conversations I have had with Service personnel. While I have always found people to be willing to engage and cheerful, passionate about and committed to what they do, it is also clear that when things do go wrong, there is a widespread reluctance to step forward and complain. This is particularly prevalent amongst the most junior ranks, while the more senior were unwilling to accept that they could be considered unapproachable by their subordinates. Indeed, many were offended at any suggestion that this should be so in their units. Reconciling these contradictory perspectives and generating greater awareness of, and confidence in, the Service complaints process is something that we must collectively tackle before we can be confident that the new arrangements are working.

The Service Complaints Commission has now transitioned to the Office of the Service Complaints Ombudsman. I have been grateful for the manner in which MOD officials have cooperated with me in

securing the resources I need and to make sure we have an appropriate regulatory framework within which to operate.

My overarching message is that I am heartened by the energy and thought that has gone into developing a process which is fair to all Service personnel. I genuinely believe that my objectives for Service complaints are supported by the Service Chiefs and there is an evident drive to raise the bar on what is considered to be acceptable behaviour.

As we embark on this new process, with my role and powers now that of an Ombudsman, my focus will be as much on working with the Services to bring about improvements as it will be on holding them to account when things go wrong. In reviewing decisions and

investigating specific allegations, making recommendations to improve the process will be an integral part of the work I ask my investigators to do. This will be challenging but exciting, a time of great change for us all. I believe the conditions for success have been set and I am very hopeful that in my report next year I will be able to describe fundamental improvements in the way Service men and women are able to have their grievances addressed.

A handwritten signature in dark ink, appearing to read 'Nicola Williams', is positioned above the printed name. The signature is fluid and cursive.

**Nicola Williams**

Service Complaints Ombudsman for the Armed Forces

# Executive summary

This 2015 Annual Report describes the activities of the Service Complaints Commissioner's office during that year and reviews some of the work carried out by the Services' own complaints teams. As the final Annual Report to be cover the work of the Service Complaints Commissioner, it also explores the journey towards Ombudsman status.

As with the previous seven Annual Reports, the Ombudsman is still unable to provide the assurance that the Service complaints system is working effectively, efficiently or fairly. However, the system is set for significant reform from 1 January 2016 and the Ombudsman is confident that these changes can lead to the establishment of a fair and effective complaints system for Service personnel.

## The work of the Service Complaints Commissioner for the Armed Forces

A Service complaint is a formal complaint made by a serving or former member of the Armed Forces about a wrong that occurred during their Service life.

The Commissioner received 404 contacts about matters which could potentially be a Service complaint in 2015, of which 280 were referred to the Services. The majority of contacts continue to be raised by Non-Commissioned Officers (NCOs) and Warrant Officers and equivalent. The majority of potential complaints related to improper behaviour.

The number of contacts received by the Service Complaints Commissioner fell by 34% in 2015 compared to the previous year, with a subsequent fall seen in potential complaints made and referrals from the Commissioner to the Services. Although the volume of contacts fell, proportionally more contacts related to more serious, prescribed behaviours.

With 2015 being the last year of the current system, much of the work undertaken by the Commissioner focussed on the transition to Ombudsman status. This involved working with MOD to shape the structure of the complaints process and preparing her Office for transition.

The Commissioner undertook a great deal of outreach work in her first year of appointment to familiarise herself with the Services. By visiting establishments at home and abroad, the Commissioner was able to get a feel for some of the issues most important to Service personnel.

## The work of the Service complaints system

All three Services reported that the addition of a Statistician to our team has brought a much needed professional dimension to data collection, resulting in consistency in the collection of data and increased confidence in the reporting process.

The total number of Service complaints made in 2015 fell 14% from the previous year and the largest reduction was seen in the RAF where 40% fewer complaints were received compared to 2014.

The Ombudsman remains concerned that the proportion of complaints received from female and BAME personnel continues to be disproportionate to their representation in the Armed Forces. Bullying, discrimination and harassment were more commonly the cause of complaints received from these groups.

All three Services have devoted considerable resource to reducing the number of legacy cases that remain open. This work was given increased impetus in preparation for the new system and saw a 50% decrease in the number of open cases that were received prior to 2014. As a result there will be fewer complaints affected by historical delay entering the new system and the three Services should be commended for the work they have done in this area.

Across the three Services only 47% of complaints were closed within 24-week target, well short of the 90% target. Improvements were evident in both the Naval Service and RAF. However no Service has yet achieved the target since its introduction.

At the end of 2015 there were more open cases falling beyond the 24-week target than in previous years. Around 690 complaints were open beyond the 24-week

time target – this represents an increase of 12% on the previous year and was largely due to increases seen in the Army.

### **Transition – the journey from Commissioner to Ombudsman**

The Armed Forces (Service Complaints and Financial Assistance) Act 2015 gained Royal Assent on 26th March 2015 and the new Service complaints system came into force on 1st January 2016. The Act introduced significant reforms to the Service complaints system and replaced the role of Service Complaints Commissioner with that of the Service Complaints Ombudsman, a body with increased powers.

The new system reduces the three stage complaints process to a two stage process. This involves a decision and at most one appeal stage. By empowering a decision body to grant appropriate redress at the lowest possible level, complaints do not need to be escalated simply to reach the level that has authority to grant appropriate redress. This will reduce delay in the system.

The role of the Service Complaints Ombudsman will be to provide independent and impartial scrutiny of the handling of Service complaints. Retaining her referral and oversight function, the Ombudsman will also have new powers of review and investigation.

The Ombudsman will have the power to review admissibility decisions made by the Services and to issue a final binding decision as to whether a complaint should be accepted for investigation by the chain of command at the initial stage or on appeal.

Furthermore, the Ombudsman will have the power to investigate undue delay both with ongoing Service complaints and other Service Matters, such as informal complaints, that could form the basis of a formal Service complaint regardless of whether a formal complaint has been made.

Most significantly the Ombudsman will have the power to investigate allegations of maladministration in the handling of a Service complaint that has been finally determined i.e. has exhausted the internal process, and to investigate the substance (merits) of finally determined Service complaints where an individual believes that an incorrect decision has been reached.

The Ombudsman will have no powers of own motion investigation, meaning she is unable to investigate a matter unless a current or former Service person has requested her to do so.

As was noted in last year's Annual Report, the new system marks tremendous progress in streamlining the complaint-handling process. However, it is anticipated that changes to procedures will be likely over the next few years to fine tune the process. The creation of an Ombudsman will not be the end of the process.

### **Recommendations**

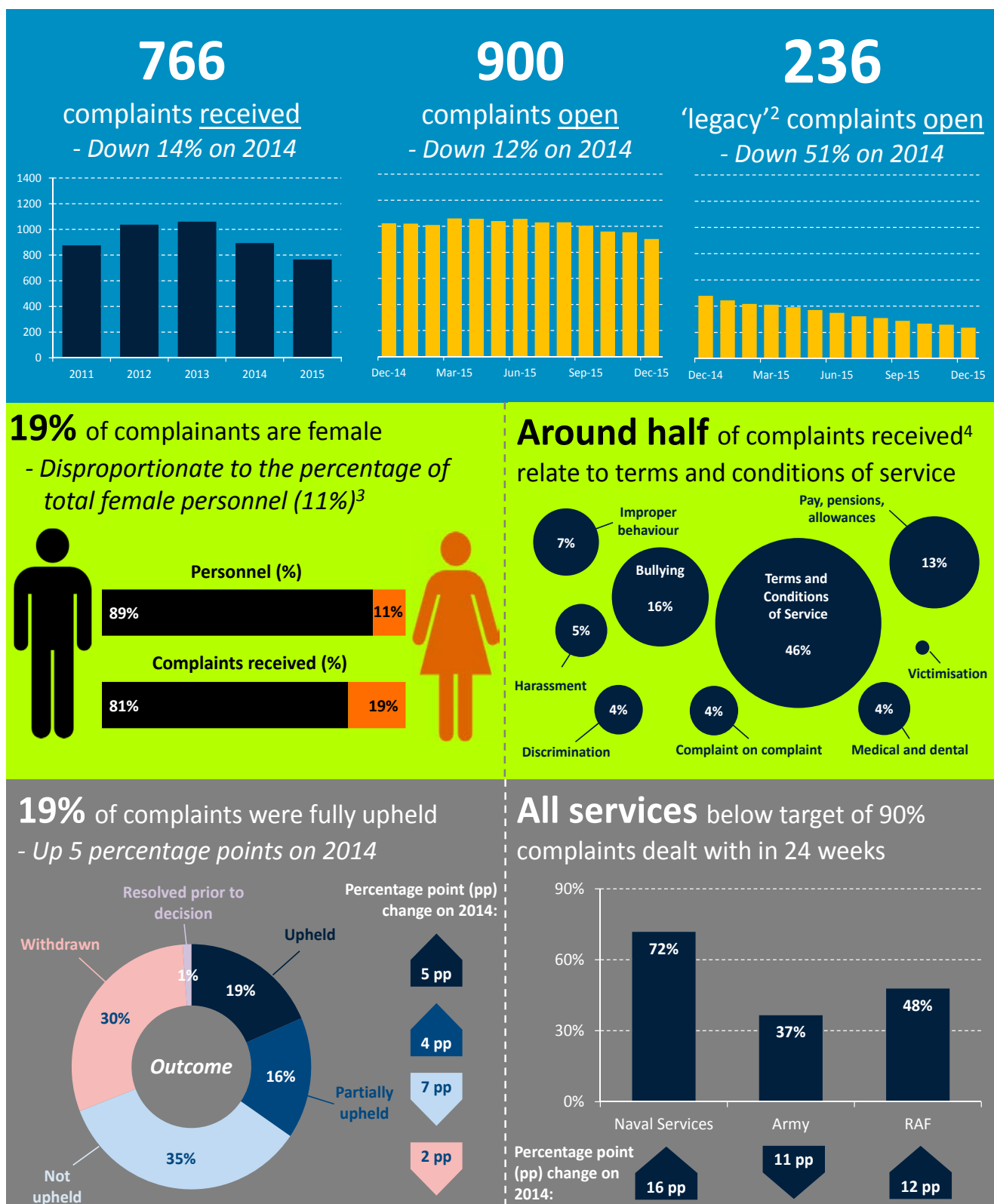
As the new arrangements took effect from 1 January 2016, the Ombudsman decided not to make any recommendations in her report this year. Although she remains unable to report that the system is efficient, effective or fair, the Service complaints system that was in place over the reporting period no longer exists. The changes to the system are a direct result of the many issues that have been highlighted by her office since it was established in 2008. While the lessons of the past must not be forgotten, it is only fair to give the new system a period of time to operate before it can be objectively evaluated.

The Service Complaints Ombudsman's Annual Report 2016, which will be published next year, will report on the operation of the new system in its first year and make recommendations as appropriate.

Updates on any outstanding recommendations made in past reports can be found in Annex B.



## Work of the Service complaints system<sup>1</sup> 2015



1) Data sourced from Single Service statistics returns using underlying data sourced from the Joint Personnel Administration System for the Armed Forces.

2) Complaints received prior to 2014 are considered as ‘legacy’ complaints.

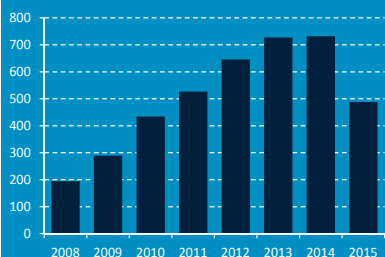
3) Figures taken from [UK armed forces biannual diversity statistics: 2015, Ministry of Defence](#)

4) Complaint type recorded at the point of receipt by Services and relate to the primary wrong reported by the complainant - one complaint type is recorded per complaint.

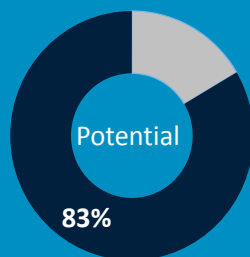
5) Percentage of complaints which could be decided within 24 week period – excludes cases which have been undecided for less than 24 weeks as the end of the year.

## The work of the Service Complaints Commissioner for the Armed Forces<sup>1</sup> 2015

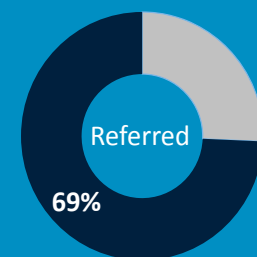
**488** contacts to the Commissioner



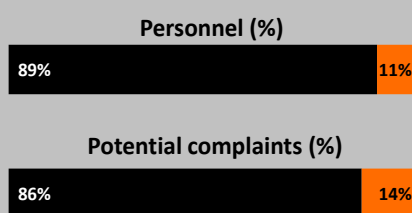
**404** considered potential complaints<sup>2</sup>



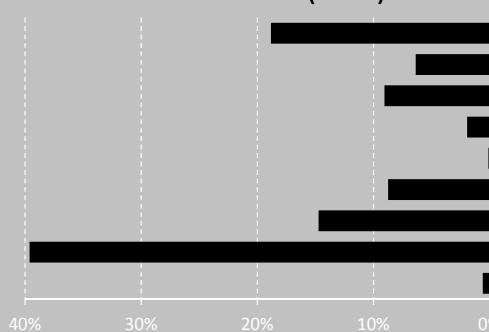
**280** cases referred to Services<sup>3</sup>



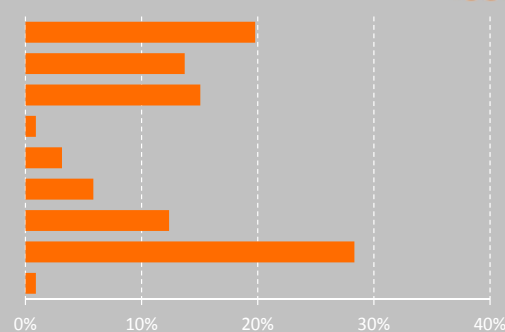
**17%** allegations<sup>4</sup> from men include harassment or discrimination – half that of women (33%)



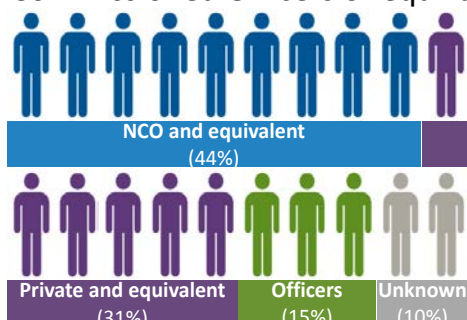
**14%** complaints to SCC from women, disproportionate to total female personnel<sup>5</sup>



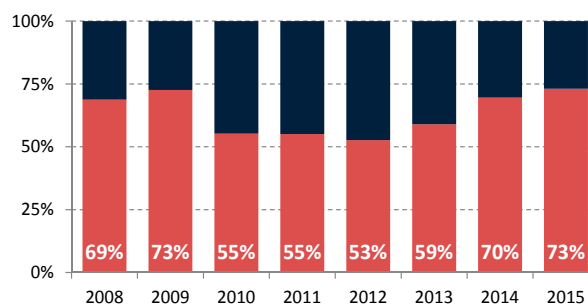
Bullying  
Discrimination  
Harassment  
Racial harassment  
Sexual harassment  
Victimisation  
Bias  
Improper behaviour  
Maladministration



**44%** of potential complaints are from Non-Commissioned Officers or equivalent



**73%** of potential complaints relate to prescribed behaviour<sup>4</sup>



1) Data sourced primarily from Office of the Service Complaints Commissioner casework system.

2) Potential complaints relate to matters which the Service Complaints Commissioner (SCC) believes could be the subject of a Service complaint and require a referral decision.

3) The SCC cannot investigate complaints but has discretion to pass any allegation made to her to the individual's chain of command – this is known as a referral.

4) Breakdowns of allegation type are recorded at the point of receipt by the SCC and relate to the prescribed behaviours only. This includes bullying, harassment, discrimination, bias, dishonesty, victimisation and other improper behaviour. There can be more than one allegation per complaint, and percentages presented here are based on total allegations, not total complaints.

5) Figures based on combined regular and reserve estimates taken from [UK armed forces biannual diversity statistics: 2015, Ministry of Defence](#)

The role of the Service Complaints Commissioner for the Armed Forces is threefold:

- to refer potential complaints to the Services when individuals request her to do so;
- to oversee how the Service complaints system is working; and,
- to report to Parliament on the efficiency, effectiveness and fairness of the system.

This chapter outlines the work undertaken by the Commissioner under her referral function and the discretionary and outreach work that underpins her function to oversee the system.

## Part 1: Referral Function in 2015

This section summarises key trends regarding contacts made to the Office of the Service Complaints Commissioner (SCC) and the referral function of the SCC. All statistics referred to can be found in more detail in Annex C, which starts on page 49. Further statistics concerning the work of the SCC in 2015 can be found on our website – [www.servicecomplaintsombudsman.org.uk](http://www.servicecomplaintsombudsman.org.uk)

### What is a Service complaint?

A Service complaint is a formal complaint made by a serving or former member of the Armed Forces about a wrong that occurred during, and was related to, their Service life. Although individuals generally raise their complaint directly with their chain of command, sometimes they are unable or unwilling to do so. In these instances they can request the Commissioner raise their intention to make a Service complaint with their chain of command. This is known as a referral and is only made with the consent of the Service person seeking to make a complaint.



The Commissioner visiting the sailors and marines of HMS DUNCAN protecting the US Carrier Strike Group in the Gulf

### Contacts to the Office of the Service Complaints Commissioner

Contacts to the Office of the Service Complaints Commissioner (OSCC) fell to levels not seen since 2010/2011.

During 2015 the SCC responded to 488 contacts, a 34% decrease on the 731 contacts received in 2014.

Of those contacts, 404 were potential complaints.

It is not possible to say for certain why this is, but it is consistent with the trends in complaint receipts reported by all three Services (see Chapter 2) and with the findings of the Armed Forces Continuous Attitudes Survey (AFCAS) which show a fall in awareness of the SCC.

Findings from the Armed Forces Continuous Attitudes Survey 2015 show that overall awareness of the SCC has decreased, owing to consistent falls seen in the percentage of non-officer ranks that are aware of how the SCC can assist them.

These findings support the impression that the Commissioner has gained from the Service personnel that she has met during her visits over the past year – awareness tends to increase with rank and seniority. The most junior, and arguably the most vulnerable, are

therefore most likely to know nothing about the Service Complaints Commissioner's role complaints system. There was also a high level of concern from those individuals seeking to complain that they may be victimised as a result of making a complaint.

Of the 488 contacts received, 84 (18%) could not be considered as a potential Service complaint. These contacts tended to be from members of the public seeking to raise concerns about the behaviour of Service personnel. In these instances individuals were referred to the appropriate body to raise their complaint.

### Contacts not pursued

Where a contact constitutes a potential complaint, the Service Complaints Commissioner's policies prevent a referral being made without the consent of the individual Service person.

Of the 404 potential Service complaints the SCC received, the Commissioner was unable to refer 89 (22%) for consideration by the Services – this has remained broadly consistent.

Service personnel give many reasons for not providing consent to refer and some give none at all. At times, individuals will ultimately choose to raise their complaint directly with their chain of command. However, others decide not to pursue a complaint at all once they are informed that the SCC is unable to investigate their complaint and it will be referred back to the appropriate Service. It is this apparent reluctance of Service personnel to raise allegations through the Service complaints system which remains a concern for the Commissioner. The Commissioner is hopeful that the new arrangements and her increased powers as an Ombudsman will make a real impact on the level of confidence Service personnel have in the system and will continue to monitor this in 2016.



Visit to 3 Commando Brigade, Plymouth, June 2015

### Potential Service complaints referred by the Commissioner

A total of 280 cases were referred to the Services in 2015 – a 40% decrease from 2014.

The decrease in contacts to the SCC in 2015 resulted in a decrease in potential Service complaints referred to the Services.

The number of complaints from Private and equivalent ranks has continued to increase, from a low of 22% in 2008 to 35% in 2015. One of the key reasons the SCC was established in 2008 was the concern that junior ranks felt unable to get their complaints in front of their Commanding Officers. It is evident that the Commissioner's referral function has continued to address this concern and this will continue to be monitored under the new system. An increasing proportion of referrals made in 2015 concerned prescribed behaviours, which include bullying, harassment, victimisation and improper behaviour.

75% of all referrals made by the Commissioner concerned prescribed behaviours, 56% of which included allegations of improper behaviour.

Since the Office of the Service Complaints Commissioner commenced in 2008 the Commissioner has made 2,470 referrals to the Services concerning potential Service complaints. Although the majority of referrals have been closed by the Services, most open referrals relate to concerns raised over a year ago (i.e. were received before 2014) and some referrals received in 2008 remain open.

81% of all referrals made by the Commissioner since 2008 are now closed.

### Decision not to refer

The Commissioner exercises a wide discretion to not refer potential complaints. That is, if it was evident that the subject matter a former or current Service person seeks to complain about falls outside the scope of what can be complained about, or occurred so long ago that it is unlikely to be accepted, the Commissioner does not refer the potential complaint. This is because the Commissioner also has a responsibility to oversee how the system functions and does not wish to compound already existing delays.

In 2015 the Commissioner exercised her discretion not to refer in 7% of potential complaints – this has remained broadly consistent between 5-7% since 2008.

Where the Commissioner decides not to refer, she will always advise the individual that this does not prevent them going direct to the relevant Service to make their complaint or direct them to appropriate alternative dispute mechanisms if these exist.

### Discretionary Activity

The Commissioner has no power to investigate or intervene in the handling of any complaint. However, there have been occasions where the Commissioner has raised a matter directly with the appropriate Service, or Defence Ministers, if she feels that it might

be indicative of a systemic failing or believes that there has been a serious shortcoming in the way a complaint has been handled.

In making these approaches, the Commissioner has been grateful for the constructive manner in which all three Services have responded to the concerns raised. During 2015, this dialogue has led, on occasion, to the Services reviewing the way they manage complaints.

Following representations on behalf of two Servicewomen who had expressed concerns about the suitability of their Assisting Officers (AOs), the Army has agreed to review the means by which AOs are appointed, and the training they receive, to ensure that all AOs are equipped to support complainants and respondents.



Visit to RAF Northolt, August 2015

## Part 2: Outreach

This section summaries and discusses some of the key outreach work the Commissioner has undertaken. This work underpins her function to oversee the working of the Service complaints system.

### Engagements

During 2015, in her first year of appointment, the Commissioner felt it was important to familiarise herself with the Services and get a feel for some of the issues most important to Service personnel. To do this, the Commissioner visited establishments at home and abroad, including a visit to personnel deployed on operations in the Gulf and Cyprus. A full list of her engagements can be found at Annex D.

During those visits, the Commissioner has enjoyed meeting with and talking to a diverse range of Service personnel. In each location, the Commissioner has held several sessions with small groups usually comprised of personnel of similar ranks. Through this, she has been able to gain useful insight into how the Service complaints process is perceived.



Of most concern was the evident lack of confidence in the process, particularly from the most junior personnel who appeared extremely sceptical of their ability to raise a complaint without recrimination. In just about every location visited, the Commissioner heard how junior Service personnel could find it difficult to raise a complaint about an immediate superior. For example, concerns were raised that in many cases people two or three levels higher in their Chains of Command were friends of those they were seeking to complain about and members of the same mess. Despite these concerns most people expressed a high degree of trust and confidence that where their Commanding Officers were actually aware of an issue, they would try to deal with the matter fairly.

While publicity surrounding the introduction of the new Service complaints process should serve to increase awareness, the Commissioner believes that the Services need to do more to generate awareness and promote confidence in the system and she believes she has an important role to play in supporting this.

In addition, the Commissioner has continued to meet regularly with key stakeholders in order to raise specific issues with the Service complaints system and to discuss transition matters. These stakeholders include, but are not limited to: Service Chiefs; the Principal Personnel Officers from each Service; key personnel from the individual Service complaints secretariats; the House of Commons Select Committee; and, Ministers and Lords.

### Education

Commanding Officers of all three Services must attend a 'Commanding Officer Designate' course as part of their training and development. A member of the Commissioner's staff presented at each course arranged by the three services during 2015. These presentations gave an overview of the Service Complaints Commissioner's role, how her post came into existence and how it will change under the Service Complaints Ombudsman. The presentation provides an important and timely opportunity to promote best practice, emphasising the critical role that Commanding Officers have in making the process work well, and what they can actually do to improve things.

The Commissioner herself has also attended many of the Senior Leadership events held by each of the Services.

The Commissioner agreed to develop a presentation designed to be delivered by the Services to all personnel undergoing training, and which will also be given on "train the trainer" courses. This work is in the process of being finalised and the objective of this will be to provide a regular reminder of the Service Complaints process, and in particular of the role of the Ombudsman within it.



Visit to 3 Commando Brigade, Plymouth, June 2015

## This chapter includes:

- an overview of Service complaints in 2015
- reporting on the work of the Service complaints system in the Naval Service, the Army and the Royal Air Force

All statistics referred to can be found in more detail in Annex C, which starts on page 49. Further statistics concerning the work of the Service complaints system in 2015 can be found on our website – [www.servicecomplaintsombudsman.org.uk](http://www.servicecomplaintsombudsman.org.uk)

The Commissioner remains unable to provide assurance that the Service Complaints Process is working efficiently, effectively, or fairly with delay still the major problem across all three Services.

### Reliability of data

Following the Commissioner's recommendation in 2014 that early work should be undertaken to agree the statistical requirements for this year's Annual Report, the Office of the Service Complaints Commissioner (OSCC) has worked with the Ministry of Defence to devise a standard basis for the data provided for this report.

This has ensured that there is reliability in the data provided, although changes made to the way that the Services calculate open and closed cases mean that any comparison with previous reports is not possible. As a result closed and open complaint trends given here are sourced from the Service complaints management information provided by Defence Personnel Secretariat, Ministry of Defence.

The Ministry of Defence and the Services have all noted that this, along with the addition of a Statistician to our team, has greatly improved the integrity of the reporting process and agreement has been reached to again undertake early work in 2015 to determine what data is required for the publication of the 2016 Annual Report.

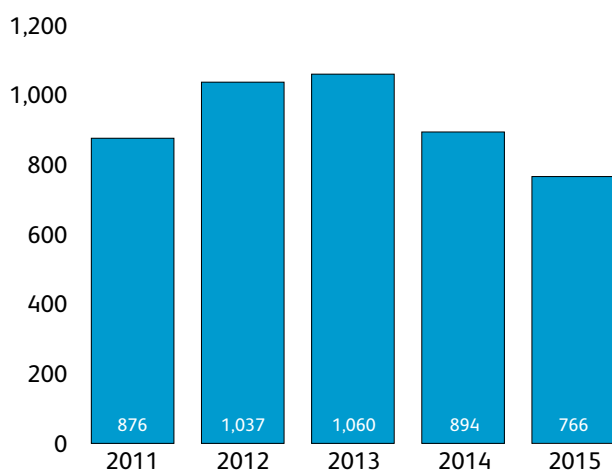
### Breakdown of Service complaints received Volume

The total number of Service complaints received in 2015 fell; this is consistent with the drop in contacts received by the Service Complaints Commissioner.

Service complaints received continued to fall from a peak in 2013. In 2015, 766 Service complaints were received down 14% on 2014 (894) and 28% on 2013 (1,060).



During the evening golden hours of Monday the 22nd September, Kilo Company, of Plymouth based 42 Commando Royal Marines, arrived at Davidstow airfield, Cornwall, for the start of a minor exercise. (2014)

**Figure 2.1:** Complaints received, tri-service, 2011-2015

The reduction in Service complaints received is true across each Service to varying degrees.

It is not currently possible to identify the particular causes for changes to complaint volumes. The volume of complaints alone provides only a partial picture and does not reflect the level of 'wrongs' occurring within the Services – rather this reflects wrongs experienced by those willing and able to engage with the system and submit a complaint. The findings of the AFCAS survey can supplement the complaints data and provide a broader understanding of how service personnel feel regarding fair treatment.

AFCAS: The report shows that while around 13% of personnel claim to have experienced bullying, harassment or discrimination only 1 in 10 of these go on to make a formal complaint. The most common reasons not to make a formal complaint were feeling that 'nothing would be done' and that complaining would adversely affect a respondent's career – reflecting a lack of confidence in the system. Furthermore, of the minority who do enter a complaint, two-thirds of them were dissatisfied with the complaint outcome and the time taken to resolve the complaint.

The Commissioner is confident that some of the reasons for this lack of confidence can be addressed by the legislative changes that came into force on 1 January 2016, and the increased assurance her new role will provide. The major benefit of this will be the Ombudsman's power to investigate allegations of undue delay in an ongoing complaint and those of maladministration in the handling of complaints that

have been finally determined. It is hoped that these new powers of independent scrutiny will encourage Service personnel to have confidence in the system and feel that they can raise their concerns without fear of recrimination.

### Complaint by subject

The subject matter of the complaints received in 2015 remained consistent with previous years. Terms and conditions of Service (TACOS) remained the subject of the majority of cases – this is true across each Service and has been the case since at least 2012. Service personnel do not have employment contracts and TACOS are their equivalent reference point. As such, the Commissioner would expect this to remain the subject matter of most complaints under the new system.

TACOS accounted for 46% of all Service complaints made in 2015 – this continues to be the most common area of complaint since 2012. Allegations of bullying accounted for 16% of Service complaints made and 13% of Service complaints were related to pay, pensions and allowances.

### Diversity

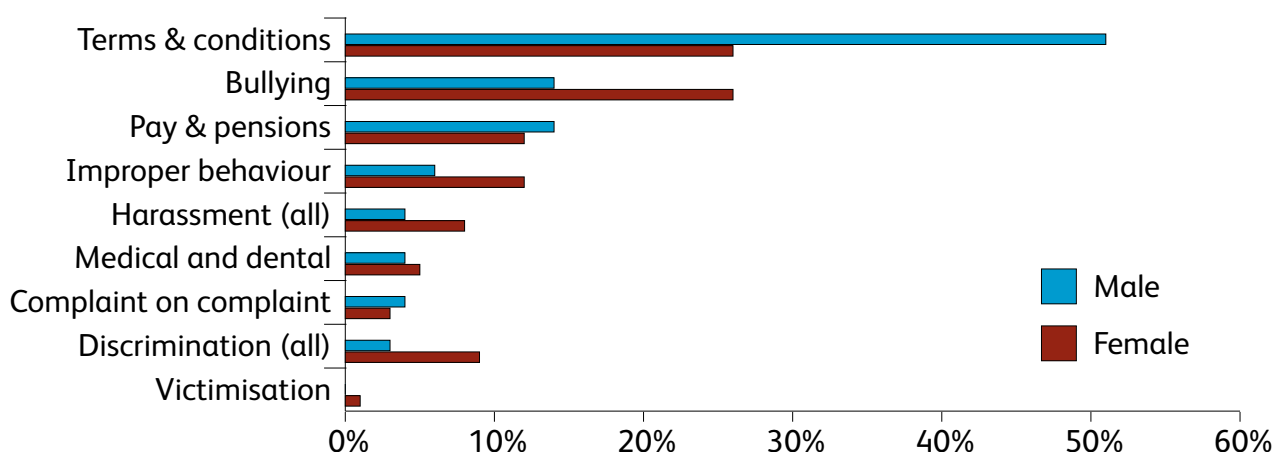
The Commissioner remains concerned at the overrepresentation of both female and Black, Asian and Minority Ethnic (BAME) Service personnel in the Service complaints system. The disproportionate representation of female and BAME personnel as complainants (19% and 11%) compared to representation in the Armed Forces (11% and 7%) continued in 2015. Bullying, discrimination and harassment were more commonly the cause of complaints for these groups.

Around 42% of complaints from female personnel relate to bullying, discrimination and harassment compared to only 20% for male personnel.

Similarly, 50% of complaints from BAME personnel relate to bullying, discrimination and harassment compared to only 20% for White personnel.

These are issues that the Ombudsman will seek to explore further over the coming years in order to determine the root causes of the overrepresentation and to work with the Services to bring about a reduction in the cause for such complaints.



**Figure 2.2:** Complaints received by gender and type, tri-service, 2015

### Handling of Complaints

Generally speaking, the Commissioner feels that complaints were handled well at level 3. Complaints at this level receive well-reasoned decisions which include apologies for any delay or mistakes in process that have come before. However this is not the case earlier in the process. Levels 1 and 2 are often marked by unacceptable delay in making relatively straightforward decisions, poorly articulated decision letters, and a lack of engagement from Deciding Officers. All of these issues contribute to delay and the low levels of satisfaction with the process. Under the new arrangements, the Ombudsman has the ability to investigate undue delay in ongoing matters. This power should have the effect of addressing unacceptable delay and lack of engagement in a timely manner.

Delay in the handling of complaints continues to be the biggest concern in the functioning of the Service complaints system. Across the three Services the system as a whole is operating well below the timeliness target of completing 90% of cases within 24 weeks.

Across the three Services only 47% of complaints were closed within the 24-week target, this is consistent with previous years. Improvements on last year were evident in both the Naval Service (up 17 %) and RAF (up 12 %), however no Service has yet achieved the target since its introduction.

In 2013, the SCC introduced a new reporting system to provide better visibility of cases which had exceeded the 24-week target, 'red flag cases', or were likely to exceed the 24-week target, 'yellow flag cases'. More complaints remained open beyond the 24-week target in 2015 and on average they were open for longer.

At the end of 2015 there were around 690 complaints open beyond the 24-week time target – this represents an increase of 12% on the previous year. This increase was largely due to a 33% rise in Army red flag cases. Of red flag cases, 70% remained open for more than double the 24 week target period.

While acknowledging the ongoing delay, there has nevertheless been some progress made in dealing with the backlog of cases. The Services were directed by the Chief of Defence Personnel's two-Star Service Complaints Reform Board to reduce, as far as possible, the number of Service complaints submitted prior to 1 January 2015 which remained open. This led to a tri-service reduction of 50% of such legacy cases, which substantially reduced the number of cases subject to historic delay to be transferred to the new system.

The Ombudsman believes that the changes to the system and the work undertaken to reduce legacy cases in 2015 can have a real positive impact on the delay many Service complaints are subject to and will continue to assess the impact of delay under the new system.

### Lack of confidence in the system

As discussed in Chapter 1, the Commissioner continued to be concerned by the number of personnel who decline to make a Service complaint despite experiencing poor treatment.

An example of this is found in both the AFCAS and the Army Sexual Harassment Survey 2015 which reported very low levels of personnel willing to submit a complaint following a perceived wrong.

The Army Sexual Harassment Survey 2015 reports a troubling frequency and common occurrence of experiencing offensive sexualised behaviour in the force – particularly amongst Servicewomen. Despite this only 3% of all those who suffered a ‘particularly upsetting experience’ made a Service complaint. Of the minority who did make a complaint most were dissatisfied with the process and close to 90% stated that an effective way to deal with sexual harassment would be to have a *‘complaints procedure that work’*.

The Commissioner’s aim in taking on the role of Ombudsman is to establish a Service complaints system that every Service person has confidence in and this will continue to be an area that is assessed under the new system.

### Alternative dispute resolution

There is anecdotal evidence to suggest that people are finding other ways to resolve their disputes and that mediation is increasingly being used to resolve disputes. For example during a visit to RAF Akrotiri, the Commissioner was interested to learn how mediation was being used to not only resolve workplace grievances, but also those which threatened to spill over into the workplace. This was an important part of the Commissioner’s familiarisation with the Services where she was seized by the blurred demarcation between work and home life in the Services, particularly when people are living and working within the confines of a military base.

The Army has also taken positive steps to encourage mediation. Trained mediators now filter all complaints received by the Army Service Complaints Secretariat with a view to identifying those areas where mediation might be appropriate.

The Naval Service reports that 87% of the mediations attempted in 2015 were successful.

The RAF offer mediation as a possible method of alternative dispute resolution where complainants indicate that they want to have their views heard and their issues resolved, but do not necessarily wish to make a formal Service complaint.



Two Commando Helicopter Force Merlin Mk3 helicopters from 846 Naval Air Squadron on exercise with Royal Marine Commando's from Whisky Company 45 Commando near Harstad northern Norway

The Commissioner encourages people to consider alternative options that could lead to an early and satisfactory resolution of a grievance where it is appropriate to do so.

A note of caution needs to be added to the use of alternative dispute resolution, including informal resolution, as a means of resolving grievances. As was the case last year, the Commissioner was contacted following concerns about how such methods may have been implemented. Some individuals reported feeling pressured to accept an informal resolution, while others allege they were told they could not embark on the formal process until the informal option had been exhausted. All personnel must remember that engaging in alternative dispute resolution, including informal resolution, is a choice for the complainant to make and it is not mandatory.

Complaints from individuals can often be an indicator of systemic failings and it is therefore not enough to simply provide redress to the individual, underlying problems must be identified and tackled. Informal resolution may not offer an opportunity to do this, but rather only provide quick redress to an individual complainant. Since there are no existing mechanisms in place to capture statistics on the number of cases resolved informally, the Services should seek to improve recording of informal complaints on JPA to ensure that such resolution is not disguising the extent of a particular issue.

From 2016, the Ombudsman will be able to review any delay in resolving “Service Matters” i.e. matters that have been raised with the chain of command which could potentially form the basis of a formal Service complaint, even if a formal Service complaint has not been made.. This has the potential to give the Ombudsman some oversight of issues arising in the handling of such informal complaints.

### Assisting Officers

Assisting Officers (AOs) have a vital role to play in supporting complainants, and indeed respondents, through the Service Complaints process. The Commissioner feels that it is essential that complainants and respondents are provided with AOs who have the necessary experience to provide appropriate support. There is evidence to suggest that this is not always happening.

The subject of AOs has been a common theme for those expressing concerns to the Commissioner about the way their complaints have been handled.

Individuals have complained about a lack of contact with their AO or that their AO lacked the experience necessary to support them. For example questioning whether a junior inexperienced officer was the best person to provide support when allegations have been made against his superiors.

The AFCAS 2015 reports that 32% of those entering a complaint were satisfied with the support received from their Assisting Officer – this represents a 14 percentage point fall on the previous year and is the lowest level of satisfaction seen between 2009-2015.

In one specific case, which the Commissioner discussed with the Army’s Director of Personnel, a complainant felt that it was inappropriate for her to have been allocated a male assisting officer when her allegations centred on sexual assault and harassment. The same individual also suggested that any AO should be trained to provide support to victims. The Director noted that the role of the AO was to provide support through the complaints process, not to provide specialist advice or counselling, which were services that should be provided by other areas, however Assisting Officers should be able to signpost individuals to this support. This particular issue has now been addressed within the revised Joint Service Publication on Service Complaints which directs Assisting Officers to the guidance on supporting victims of crime.

The Director of Personnel accepted that it could be timely to review the way Assisting Officers are selected and trained to ensure the best possible support was being provided to respondents and complainants. The Commissioner has suggested that the other two Services should follow this lead.

This issue will be monitored by the Ombudsman under the new system and she will make recommendations as appropriate should current measures fail to improve the process.

### Communication

Lack of communication, or meaningful communication, is something that individuals regularly comment upon when discussing their Service complaint with the Commissioner and her staff. The issues that feature very heavily include: not being informed that the investigating or Assisting Officer has changed; the progress of their complaint; or, the reasons for protracted delay. The Commissioner has highlighted this concern to the Services and made it clear that under the new arrangements when the Service Complaints Ombudsman investigators are reviewing matters of “undue delay” or “maladministration”, lack of communication, including a lack of meaningful communication, will be considered unacceptable. The Commissioner is also keen to point out that she accepts there can be good reasons for failing to decide a complaint within the 24 week period, and that delay can be unavoidable. There is, however, no justification for failing to keep complainants and respondents updated on the progress of a complaint.

### Service Specific Update

#### Naval Service

The Naval Service has devoted considerable resource to reducing the number of open complaints submitted prior to 2015, resulting in an overall reduction of 85%. This means that only 21 of the 154 legacy complaints that were open at 1 January 2015 will transfer to the new system. The allocation of this resource is also reflected in the casework output, where the number of complaints signed off for submission to the appropriate Level 3 decision body reflects a 90% increase on 2014 and a 68% improvement on 2013, which had been their highest recorded output since reporting began in 2008.

Reductions in open Service complaints were also achieved through the continued application of the “quick win” initiative, in which Casework Naval Legal Services (CNLS) look for ways to fast-track complaints received at Level 2 where a wrong has clearly occurred and redress can be offered outside of the Service complaint system. In 2015 16 complaints were resolved in this way, 14 of which were raised in the same year. The Naval Service has committed to continuing this form of resolution, with minor modifications, under the new system for all appropriate cases.



Royal Navy HMS Bulwark (2013)

In demonstrating an ongoing commitment to continuous improvement, an initiative in which CNLS regularly share data on the handling of Service complaints with 1-Star and 2-Star formations has resulted in an anecdotal improvement of the handling of Service complaints as a result. In addition, they have evidenced a commitment to treating individual complaints seriously, and implementing lessons learned for the benefit of the wider Naval Service community. Such process improvements include:

- the addition of an “independent” member on Promotion Selection Boards for RN Ratings;
- implementing a number of Diversity and Inclusion (D&I) initiatives to ensure an enduring application of, and compliance with, D&I policies within a regional submarine flotilla rising from a bullying and harassment complaint investigation; and,
- ensuring that recommendations made by Service Complaints Panels (SCPs) were put forth for consideration in the drafting of the revised JSP 831 as appropriate.

Although the the target for resolving 90% of Service complaints within 24 weeks was not met by the Naval Service, the 72% achieved was the highest across the three Services. The Commissioner commends the Naval Service for their targeted use of resources and hopes that the successful reduction in legacy cases and ongoing commitment to “quick win” resolution will provide the right conditions for the target to be met under the new arrangements.



## Army

The Army has made considerable progress this year in the resolution of Service complaints made prior to 1 January 2015 in line with the Chief of the General Staff's direction to reduce such legacy cases. The Army has widened their commitment and endeavour to close all Service complaints made before 1 January 2016 by 31 December 2016. A number of initiatives have been introduced to support this aim which has resulted in a reduction in the number of legacy complaints, an increase in the number of complaints under active consideration, a rise in the number of oral hearings, and a 50% rise in monthly clearance rates for Level 3 complaints. Despite this progress, they acknowledge that having resolved only 32% of all complaints within 24 weeks they still have some way to go before they are able to routinely meet the 90% target.

Although the 90% target was not met, the Army was able to close more complaints in year than the number of complaints submitted for the second year in a row. This is an encouraging development and in combination with the work undertaken to resolve legacy complaints should help to put the Army in a good position to manage the new arrangements.

In addition to the work undertaken to resolve Service complaints, the Army has also placed a great deal of emphasis on addressing systemic issues in order to improve the handling of Service complaints. Such work includes:

- improving standard operating procedures and guidance for all personnel engaged in the Service complaints process;
- analysing individual complaints to identify systemic failings;
- undertaking a review of how Assisting Officers (AOs) are allocated and the training they receive in order to ensure that the most suitable AOs, with the right expertise and experience, are allocated for each complaint; and,
- using trained mediators to filter all complaints in order to highlight opportunities for informal resolution where parties to the complaint are willing.

The Commissioner welcomes the work undertaken to address these systemic issues and congratulates the Army for what they have achieved. The steps taken over the year lay the foundation for the improved management of Service complaints under the new arrangements and should improve confidence and awareness in the system amongst Army personnel.



Army reserve safety officer (2014)

## RAF

The RAF has continued to make great strides in the work started in 2014 to improve their internal processes for managing Service complaints. This work not only included focusing on the reduction of open complaints submitted prior to 1 January 2015, but looking at broader systemic issues.

The RAF now recognises that between 2008 and 2013 their focus was more on “resource efficiencies” rather than efficient handling of complaints. This resulted in three different management structures being used to oversee Service complaints in that time in addition to inadequate training and under resourcing. All of this contributed to problems that the Commissioner has reported in successive Annual Reports. Although the RAF themselves acknowledge that there is still some way to go before they meet the target for closing complaints within the 24 week period is met, they believe they have now turned the corner.



Members of the Mobile Air Operations Team (MAOT), RAF Regiment and Royal Air Force Police (RAFP) undergoing training during Exercise Agile Spear (2015)

In addition to the administrative work undertaken, there has also been considerable focus on addressing the root cause of grievances. The RAF has correctly identified command ownership being the most significant factor in this. The vast majority of grievances are caused when the chain of command, at any level, fails to demonstrate appropriate and timely interventions when something goes wrong.

The Air Force Board remains committed to ensuring that RAF personnel have their complaints treated seriously and that the internal process is fit for purpose. They have demonstrated this committed through a number of initiatives in 2015 including:

- the rollout of training to increase awareness of the Service complaints process and the importance of good complaint handling;
- adapting the “quick win” process used by the Naval Service to bring about resolution where a wrong has clearly occurred; and,
- commissioning 1 star studies to identify how complaints can be handled more effectively under the new arrangements.

The Commissioner commends the RAF for the work they have undertaken throughout the year. While the 24 week target has not been met, it is hoped that the work undertaken to reduce the backlog, improve administration and raise awareness will provide the foundation required to meet this target under the new arrangements from 2016.

## Part 1: Looking Back

The post of Service Complaints Commissioner was established by the Armed Forces Act 2006 following two influential reports that recommended independent oversight of the Service complaints system: the Report on Duty of Care by House of Commons Defence Committee; and the Deepcut Review Report by Nicholas Blake QC.<sup>1</sup> Both reports were commissioned following the tragic events at Deepcut between 1995-2002 in which four Army Recruit trainees died. The Deepcut Review Report, which detailed the investigation into the circumstances surrounding those deaths, highlighted a culture which made it difficult for Service personnel to raise or pursue concerns about bullying or other improper behaviour with the chain of command. The role of the Service Complaints Commissioner was created to address this issue, with the function to act as an alternative point of contact for Service personnel who were unable to raise their complaint direct with the chain of command, oversee the handling of Service complaints and to report annually on the efficiency, effectiveness and fairness of the system. The first Service Complaints Commissioner, Dr Susan Atkins, took up post on 1 December 2007 and her powers came into force on 1 January 2008.

The first Annual Report published in 2009 set out the situation at that time with regards to Service complaints and detailed a number of procedural issues that were contributing to an ineffective system:

1. There was inadequate, incomplete and unreliable records maintained of complaints made;
2. There were no time targets for dealing with complaints;
3. Complaints, even those alleging serious bullying, harassment or discrimination, were investigated within the complainant's unit, often within the chain of command;
4. All complaints were decided within the chain of command, by the complainant's Commanding Officer; and,
5. Many complaints were dealt with on the papers and it was not unusual for the complainant to have the first opportunity to talk to someone deciding his or her complaint only at the final stage, the appeal in front of members of the Board for their Service.

In addition to these procedural issues, Dr Atkins found a number of factors that contributed to a culture which made it difficult to raise a complaint in the first instance. First, personnel were expected to endure hardship and be resilient. As such, making a complaint could be taken as a sign of unacceptable weakness – especially for Officers. This was compounded by the concept that the team/Unit/Service was more important than the individual. A complaint about the behaviour of peers could be seen as treachery. A complaint about a superior could be seen as insubordination. Second, Service complaints were dealt with in the unit by those in the discipline chain of command. Not only could this make it more difficult for an individual to come forward, but it also raised a risk of the incorrect standard of proof being applied – the criminal test of beyond reasonable doubt instead of the civil test on the balance of probabilities. In addition, there was also a widespread assumption that an unsuccessful complaint equated to a malicious or vexatious complaint. A complainant whose complaint failed, for whatever reason, therefore exposed themselves to the possibility of retribution or recrimination, either formal or informal.

Overall, Dr Atkins found a prevailing culture that complainants were troublemakers and a misconception that very few complaints were upheld. In the 2008 Annual Report, a Senior NCO was quoted as commenting that a complaint spelled trouble for all involved: if you made a complaint you were a trouble maker; if you had a complaint made against you there was no smoke without fire; and, any Commanding Officer who had a complaint made on his watch had failed.

The absence of good and publicly available data may have contributed to these misconceptions. However, it was clear that the infrastructure for managing Service complaints was not sufficiently robust to counteract the negative consequences of the military culture. Most attention was given to a complaint at its final level, simply because of the seniority of the decision makers. While a great deal of care was taken in dealing with complaints at this final stage, and most were upheld, Dr Atkins felt that more effort should have been given

<sup>1</sup> Now Sir Nicholas, Mr Justice Blake

to getting the complaint “right the first time”. A better quality and more timely decision at the first level, with good and personal communication, would make appeals less likely, even if complaints were not upheld.

In addition to the establishment of the Service Complaints Commissioner, the Armed Forces Act 2006, which came into force on 1 January 2008, provided a number of other improvements to the system. This included the opportunity for highest level appeals to be decided by a wider range of senior officers sitting as a Service Complaint Panel.<sup>2</sup> Moreover the Act required any panel deciding a complaint about bullying, harassment, discrimination or other specified matters to include an independent member. Having done similar work in a wide range of civilian organisation, the experience and expertise these independent members brought has been invaluable.

Alongside these changes, Dr Atkins set six three year goals aimed at improving the efficiency, effectiveness and fairness of the system, including:

- Accurate data recording, time targets and communication;
- Reducing the gap between the incidence of unacceptable behaviour and complaints about such behaviour; and,
- Goals for herself and her office, to be judged by Services, Ministers and Parliament, to be playing an effective part in assuring the proper treatment of Service personnel.

Dr Atkins worked with the Services to assist and advise them in meeting these goals. She also made recommendations for improvements in each Annual Report, most of which were accepted and acted upon, and monitored their progress in each Annual Report. In her 2010 Annual Report, Dr Atkins set out four new simplified goals concerning timeliness, reductions in the incidence of unacceptable behaviours, improved performance of specialist complaints systems and the effectiveness of the SCC and her office.

In 2012 the Services introduced a new data recording module on its personnel administration system which replaced legacy system and by the end of 2014 staff had been trained to use and were feeling the module provided them with better Service complaint data. From April 2013, every two months the Services provided the

SCC with information on every complaint that had, or was likely to, exceed the time targets that had been set down.

To deliver the new process from 2008, each Service set up a single integrated secretariat for managing and overseeing all Service complaints, with greater liaison with legal and specialist advisers and an increased focus on getting the first decision right. For complaints about bullying, harassment or discrimination, specialist Harassment Investigation Officers (HIOs) were introduced, relieving the chain of command from the burden of finding resources to investigate such complaints and contributing to speedier handling.

The Services introduced more flexibility in dealing with complaints with a view to getting resolution at the lowest appropriate level, including expeditious informal handling and speedier escalation to final appeal, if that was the appropriate level for resolving the complaint. Training was provided to those dealing with complaints, including the SCC giving presentations at every Commanding Officer Designate course, and on other training courses including legal training. More attention was given within the Services to information provided in the Armed Forces Continuous Attitude Survey about the incidence of bullying, harassment and discrimination, and action taken accordingly. There was a shift in attitude at the top of the Services about Service complaints with a growing realisation about the positive use they could have as part of continuous improvement initiatives. However, evidence from the oversight of individual cases between 2008-2014 suggested that such a shift was not universal and a change in culture might take longer to filter down through the ranks.

However, despite all these changes, Dr Atkins was not able to give Ministers and Parliament an assurance that the system was working efficiently, effectively or fairly. The main reason was undue delay. None of the Services had met the time targets and there was anecdotal evidence of complaint cases being abandoned simply because of delay. Dr Atkins concluded that the complexity of the system was itself causing delay and unfairness. Her recommendation for a simpler, two level system with more powerful oversight by an Ombudsman, instead of Commissioner, gained much support, including from the House of

<sup>2</sup> From 2008 – 2015 these panels went on to make a significant contribution to tackling the backlog of cases awaiting decision, many of which had been in the system for years by the time they reached the panel.



Commons Defence Committee and some significant Service charities. Her recommendations were finally accepted by Service Chiefs and Ministers and passed into legislation during 2015 as outlined below.

## Part 2: Transition to Ombudsman

The Service Complaints Ombudsman for the Armed Forces was established under the Armed Forces (Service Complaints and Financial Assistance) Act 2015. The Act gained Royal Assent on the 26th March 2015 and the changes took effect from 1st January 2016.

The role of the Ombudsman is to provide independent and impartial scrutiny of the handling of Service complaints. While the responsibility to resolve Service complaints remains firmly with the chain of command, the Ombudsman has been vested with significant new powers to hold the Services to account for their handling of individual cases. These powers offer greater protection to individuals, help ensure Service complaints are handled fairly and increase confidence amongst Service personnel that their complaints will be dealt with in accordance with the law and policies governing the Service complaints process.

### Changes to the Service complaints system

The new system reduces the three stage complaints process to a two stage process, involving a decision and at most one appeal stage. This will reduce delay as the decision body will be empowered to grant redress and complaints will not have to be escalated as they were under the previous system until they reach the level that has authority to grant appropriate redress.

### The powers of the Service Complaints Ombudsman

The new Service Complaints Ombudsman is vested with the power to:

- **Refer** potential Service complaints into the system, making this step easier for personnel who are unsure of the process or reluctant to approach their chain of command directly;
- **Review** gateway decisions. The Ombudsman has the power to review decisions taken by the chain of command not to accept a complaint for investigation and decisions not to allow an appeal to proceed because it has been deemed to be out of time. The decision made by the Ombudsman as part of that review is final and binding;
- **Investigate** allegations of undue delay. The Ombudsman has the power to investigate allegations of undue delay in an ongoing Service

complaint or in a Service matter concerning an issue that could be the subject of a Service complaint, but where no formal complaint has been made. The Ombudsman must make findings and recommendations if she goes on to investigate;

- **Investigate** allegations of maladministration. The Ombudsman has the power to investigate allegations of maladministration in the handling of Service complaints that have been finally determined, and also to investigate any potential maladministration not alleged by the complainant that is identified during the course of the investigation. The Ombudsman must make findings and recommendations if she goes on to investigate; and,
- **Investigate** the substance (merits). The Ombudsman has the power to investigate the substance (merits) of Service complaints that have been finally determined and to investigate any potential maladministration in the handling of the Service complaint that is identified during the course of the investigation. The Ombudsman must make findings and recommendations if she goes on to investigate.

### Development of the new ways of working

Throughout 2015, the Commissioner and her staff have been working to identify the way in which the new powers would be implemented and the resources that an Ombudsman would require for this. While the Commissioner has been responsible for setting her own processes and procedures, there has been a high degree of collaboration with MOD to ensure that the new arrangements could be implemented seamlessly. This included the Commissioner being a member of the MOD Service Complaints Reform Board.

Late amendments to the Bill in the final stages of its passage through Parliament unexpectedly provided the Ombudsman with additional powers. The most significant of which was the ability to investigate the merits of a case where an individual remains unhappy with the decision reached by the Services once their complaint has completed the internal process. These changes necessitated a radical review of prior planning, including the resource requirements for the new role. The Commissioner was delighted however to receive confirmation that MOD would support the additional resource requirement and is satisfied that she has the resources she needs to deal with the anticipated number of applications to her office.

In establishing this new way of working, the Commissioner consulted widely with other Ombudsman

organisations in the UK and military Ombudsmen overseas, in an attempt to reflect best practice. This consultation also extended into peer review and the testing of our process. In addition to key documents being reviewed by the Ombudsman Association of UK and Ireland, the Commissioner hosted a training day on 5th November where the Commissioner's staff and complaints handlers from all three Services were able to work through a number of test cases. This provided the opportunity to validate processes and supporting policy documents, share lessons learned, and provide assurances to the Services that the Ombudsman's office would remain independent and impartial in all that it does.

The Commissioner and her staff have participated in process design workshops and encouraged the Services to use this opportunity to re-design their own systems to be faster and more flexible, with decisions made at the right level. The new system should also empower Commanding Officers to deal with grievances fairly and recourse to legal advice only where it is needed. The Services have the opportunity to make better use of the

information arising from complaints to drive improvements in Service life. While changing the complaint-handling culture in the Services will contribute to the overall success of the new system, this will take time.

Looking forward, the Ombudsman will implement performance targets for her office. One of the recurring themes which has been highlighted in past Annual Reports was delay. To mitigate this in our own internal process we have produced timelines for each element of the investigative process and will measure ourselves against these.

The first year as an Ombudsman, 2016, will be a time of challenge and learning. While we have prepared for this new role, we recognise that issues may arise in transition that were not anticipated or for which our processes do not go far enough. The Office of the Service Complaints Ombudsman will be committed to monitoring our progress and making changes as and when required to ensure that the new system is successful.

## Appendix A

### Glossary

This glossary provides a brief description of some of the main terms used in the commentary of this report.

**Annex F** – A form on which a Service complaint is submitted to the appropriate Service, e.g. formalised.

**Assisting Officers (AO)** – Individual offered to support complainant or respondent in providing help with procedural matters throughout the complaint process.

**Commanding Officer (CO)** – Normally, the CO is the officer who has been appointed by the appropriate authority to be CO of a ship, unit or establishment while able effectively to exercise their powers as such.

**Contact** – Recorded instance of an enquiry or allegation being raised with the SCC.

**DIA** – Directorate of Internal Audit.

**DITC** – Defence IT Co-ordinating Committee.

**E&D** – Equality and Diversity.

**FEHIO** – Fee Earning Harassment Investigation Officer.

**Formal complaint** – Allegation(s) submitted by complainant to relevant Prescribed Officer in writing, signed and dated in accordance with regulations.

**HIO** – Harassment Investigation Officer.

**Informal complaint** – Any allegation(s) or issue raised with the SCC or the Services ahead of a written, signed and dated complaint being submitted.

**Informally resolved** – Refers to a complaint which is resolved prior to a formal decision being made.

**Joint Personnel Administration (JPA)** – The system used by the Armed Forces to deal with matters of pay, leave and personnel administrative tasks. JPA replaced a number of single-Service IT systems and was implemented in April 2006 for RAF, November 2006 for Naval Service and April 2007 for Army.

**NCO & WO** – Non-commissioned Officers (including corporals, sergeants and chief technicians) and Warrant Officers. The Royal Navy does not use NCOs, but calls them senior ratings (or senior rates).

**Non-prescribed behaviour** – Categories of behaviour that are not prescribed by regulations, covering a wide range of matters including pay, appraisals, promotion, discharge and medical treatment.

**Officers** – A member of the Armed Forces holding the Queen's Commission to lead and command elements of the forces. Officers form the middle and senior management of the Armed Forces.

**Out of time (OOT)** – When a complaint is made more than three months after the alleged incident(s) and it is not considered just and equitable to extend the time limit.

**Potential complaint** – An allegation of a wrong which relates to a Service matter and is considered for possible referral by the SCC.

**Prescribed behaviour** – Categories of behaviour that are prescribed by regulations, including bullying, harassment, discrimination, bias, dishonesty, victimisation and other improper behaviour.

**Prescribed Officer (PO)** – Will normally be the CO, but if the CO is implicated in or the subject of the complaint, the PO will be the CO's immediate superior or an officer appointed by the higher authority of the Service concerned.

**Pte & Equivalent** – A private is a soldier of the lowest military rank (equivalent to NATO Rank Grades OR-1 to OR-2 depending on the force served in).

**Red flag complaint** – A complaint which has missed the 24-week target and remains unresolved.

**Referral** – SCC discretionary power to pass any allegation made to the individual's Commanding Officer or Senior Officer. The SCC may then take oversight of how any Service complaint relating to the allegation is handled.

**Service complaint** – A formal complaint made by a serving or former member of the Armed Forces about a wrong that occurred during and was related to their Service life.

**Special to type (STT)** – A category of complaint where there is "another formal system" that must be exhausted prior to a SC being acted upon, e.g. Service medical care, housing complaints, pay & allowances.

**Withdrawn** – A complainant decides to retract allegations made – this can occur at any point of the Service complaint process.

## Appendix B

### Outstanding Recommendations 2009-2014

Progress against outstanding recommendations from 2009-2014. Any recommendation that was assessed as achieved, not accepted or no longer applicable in earlier reports is not listed below. The progress reports and status against each outstanding recommendation refer only to the Service complaints system as at 31 December 2015. These recommendations will not transition to the new system.

**Key:** Green = achieved; Amber = in progress; Red = not achieved; Black = not accepted OR no longer applicable

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2009	9.11	Need to focus on organisational improvements as well as individual redress	The Services should also develop a system for identifying trends, capturing lessons and monitoring implementation, similar to that developed by DITC following reports by the Defence Committee, the Deepcut Review and by Ofsted.	<p>Since the introduction of the Service complaints system in 2008, MOD has continually improved the manner in which complaints have been handled through the sharing of best practice and lessons learned, and implementation of many of the SCC's recommendations.</p> <p>There are Service Complaints Governance Boards and a Service Complaints Working Group which provide for identifying trends and appropriate action in response, and for sharing best practice respectively. The Service Complaints Statistics Working Group, chaired by the SCO's statistician, was formed in 2015 and provides a valuable means by which to monitor the system by exploiting the available data.</p> <p>MOD are currently re-assessing how effective the Defence Lessons Identified Management System (DLIMS) might be in identifying and sharing lessons.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2009	9.14	Inconsistency of practice and lack of expertise	Service Secretariats to be resourced to monitor operation of the Service Complaints System effectively, to identify where the chain of command is less familiar with the process and to provide assistance or take remedial action as necessary.	<p>Since this recommendation was made, the individual Services have improved their processes and restructured their teams to best monitor the Service complaints system. For example the creation of the Army Service Complaints Win in 2010, and the Navy's Service Complaints Monitoring Cell and its governance board.</p> <p>The implementation of the new complaints system in January 2016 also required the Services to wholly review the structure and functions of their specialist teams to align with the requirements of the new process. Included in the Armed Forces Service Complaints Benefits Plan, is the more efficient use of manpower resources – this will be reviewed 6 monthly and measured on an annual basis.</p> <p>As part of the work to introduce the new system, MOD produced a communications plan and have communicated widely with Service personnel (and those civilians involved in the handling of complaints) to familiarise them with the process and where to go for advice and support should they need it. The structure and format of the new JSP 831 was also designed to provide a more user friendly approach for those involved in the process.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2009	9.15	Inconsistency of practice and lack of expertise	The review of guidance on the handling of complaints to explore how best to eliminate the confusion that arises by having two sets of guidance for E&D and other complaints.	Since this recommendation, JSPs 831 (Service Complaints) and JSP 763 (MOD Bullying & Harassment Procedures) have been reviewed and re-published on several occasions. When undertaking these reviews, the alignment of processes, terminology and the relationships between the documents has been made clearer to eliminate any such confusion. MOD have assured that this will continue to be a key consideration when undertaking future reviews of the documents.	
2009	9.24	Improve the handling of complaints of bullying, harassment and discrimination	Service Secretariats should review and share their experience of SCPs sitting with independent members, consulting and taking into full account the views of those Panel members, with a view to developing best practice and a consistent approach.	Since 2011, MOD has undertaken an annual review of the Service Complaints Panel (SCP) process. This has involved a workshop with the Independent Members and representatives from all of the Services to identify examples of good practice across the Services, to share lessons learned and to develop an understanding of the key issues facing those involved in SCPs.  This annual review will continue with the implementation of the new service complaints system.	
2010	10.1	JPA access	The SCC's office should have unlimited read-only access to the JPA complaints module, and all associated complaints files.	Following this recommendation, the then SCC Head of Office confirmed that access to JPA was no longer an aspiration for the SCC. The subsequent introduction of the monthly flag reports in 2013 provided the Commissioner with details of complaints that had been in the system beyond 24 weeks and the reasons for any undue delay.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2010	10.4	Resourcing	Service Chiefs should resist cutting staffing levels in their complaints secretariats before the system is judged to be operating effectively, efficiently and fairly.	See recommendation 2009 (9.14) above.  The implementation of the new complaints system in Jan 2016 also required the Services to wholly review the structure and functions of their specialist teams to align with the requirements of the new process. Included in the Armed Forces Service Complaints Benefits Plan, is the more efficient use of manpower resources – this will be reviewed 6 monthly and measured on an annual basis.	
2010	10.5	Investigations training	The quality assurance arrangements for the HIO cadre should be extended to those investigating the most serious allegations of mistreatment. Investigators of such complaints should not include Service police, but should receive appropriate external training.	In MOD's formal response to this recommendation at the time, it stated that:  <i>"The quality assurance arrangements will apply to all investigations carried out by the new HIO cadre. As these arrangements are tested through practice, we will be able to consider how they might complement (or indeed benefit from sharing best practice) from those already in place for quality assuring investigations, such as work carried out by the Army Inspectorate".</i>  With regards to the second part of the recommendation regarding the investigators of such complaints not including Service police, MOD commented:  <i>"We do not agree that investigators should never be drawn from Service police personnel".</i>  Following the publication of MOD's report on the performance of the FEHIOs by the SCC in her 2013 annual report (pages 76 – 79), MOD continues to monitor and improve the performance of the FEHIO cadre.	Although MOD rejected the second element of the recommendation, steps have been taken to address the first element.



Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2010	10.10	SCP arrangements	SCP independent members should be consulted on a new procedure for chairing SCPs.	<p>See Recommendation 2009 (9.24) above</p> <p>Since 2011, MOD has undertaken an annual review of the Service Complaints Panel (SCP) process. This has involved a workshop with the Independent Members and representatives from all of the Services to identify examples of good practice across the Services, to share lessons learned and to develop an understanding of the key issues facing those involved in SCPs.</p> <p>This particular issue was not raised again in subsequent Annual Reports.</p>	
2010	10.11	Multiple party complaints	Services complaints involving more than one Service or the Civil Service should have a representative from each relevant Service and, where appropriate, the Civil Service on the SCP.	<p>MOD undertakes an annual review of the Service Complaints Panel (SCP) process to identify examples of good practice across the Services, to share lessons learned and to develop an understanding of the key issues facing those involved in SCPs. This review is conducted in consultation with the Independent Members and representatives from each of the Services.</p> <p>The new service complaints system does provide the flexibility for the appointment of an appropriately authorised person or panel of persons to decide a complaint.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2010	10.12	Service police complaints	Service complaints from or about the Service police should have two independent members on the SCP, one of whom should have expertise in policy professional standards.	<p>The new service complaints system provides for the inclusion of one or more independent persons where the service complaint includes allegations concerning the improper exercise by a service policeman of his statutory powers as a service policeman.</p> <p>The question as to the composition of a deciding body is a matter for the person who has authority delegated by the Defence Council, who will take into account the circumstances of the complaint to be decided.</p>	
2010	10.15	SCC follow up	The SCC's role in following up on whether lessons have been learned by the Services should be formalised.	Under the new arrangements, the Services will report on the implementation of recommendations made by the Ombudsman by way of an Action Plan. The format of this plan also includes scope to feed back on wider lessons learned.	
2010	10.16	SCC resource and recruitment	The SCC's office should be properly resourced and resources should be provided in a timely manner. SCC staff should automatically be recruited from across the wider Civil Service and not just from the MOD.	<p>The SCO does not have blanket approval to skip Stage 1 (MOD Level Transfer) of the recruitment process and move to Stage 2 (Civil Service Surplus). However, on each occasion where the SCC has provided justification to follow skip Stage 1 this recruitment path has been approved by MOD.</p> <p>The Office of the SCO has been properly resourced accordingly to the projected number of cases it will handle.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2010	10.20	Armed Forces Ombudsman specialist complaints systems	The Armed Forces Ombudsman should also include all the specialist complaints systems within the Services as part of the Armed Forces covenant.	<p>See recommendation 2014 14.8 below.</p> <p>MOD undertook a review in 2015 of the STT complaints processes to see whether, and if so how, complainants under these processes might be able to benefit from the new Service complaints system. That review concluded that the greater benefit overall was in maintaining the status quo in relation to these STT processes.</p> <p>The three STT processes are successful in resolving a large volume of the complaints that they receive, and have either recently undergone or are about to undergo significant changes to their procedures. Where these changes have already been implemented, in the pay and allowance process, they have delivered an increasingly effective system, and in turn has both the capacity and expertise to process a significant number of cases/complaints effectively. It is hoped that the upcoming review of the medical/dental and accommodation complaints procedures will result in similarly efficient and effective procedures.</p> <p>Service personnel who have raised a STT complaint can request the Ombudsman investigate undue delay in a Service Matter, which may include STT complaints.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2011	11.1	Medical Treatment Complaints	I recommend that the Ministry of Defence (MOD), Defence Medical Services (DMS) and Services consider implementing a system for complaints about medical treatment similar to that adopted for Service complaints about redundancy. This could be reviewed as part of the Review into how to improve the Service complaints system, which is still under way.	<p>In April 2014, the Surgeon General (SG) published a new process for 'Complaints About Healthcare Services Provided By Defence' (JSP 950 Leaflet 1-2-10). This followed consultation with both the Chief of Defence Personnel Complaints team and the single Services – a revised JSP was published in Dec 14. The SCC has regularly engaged with DMS and SG on such matters.</p> <p>In 2014, SCC and SG identified that the new medical complaints system did not include secondary care. The system is being revised in 2014/15 to adjust this.</p> <p>SG re-published 'Complaints About Healthcare Services Provided By Defence' (JSP 950 Leaflet 1-2-10) in Dec 15.</p> <p>The DIA team are to conduct an audit (sponsored by SG) of the 'Management of Medical Complaints and Medical Components of Service Complaints' – this was due to commence in Jan 16.</p>	
2011	11.4	JPA – Recording of Diversity Complaints	I recommend that the recording of diversity complaints be reviewed also as part of management response to the DIA audit of JPA so that Ministers, Service Chiefs, Parliament, the Equalities and Human Rights Commission and I can have full confidence in the information reported.	<p>The provision of Equality and Diversity data to the SCC for provision in her annual reports was reviewed in 2012. Since then, the formal complaints data provided has been sourced from JPA. The recording of informal complaints data is being reviewed as part of the work to identify and deliver the required changes to the system ahead of implementation of the new Service complaints system in 2015.</p> <p>See Recommendations 12.1 and 13.1 for further information on the work being taken forward with regards to JPA.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2011	11.5	Role of AO	I recommend that the role of the Assisting Officer (AO) be reviewed and clarified as part of the action following the Review of the Service complaints system. This review should consider the criteria for selection being used by the Services and the possibility of better guidance and/or training.	<p>The role of the AO and any training or improved guidance required is being considered as part of implementing the new process as set out in the Bill. See Recommendation 12.6.</p> <p>The guidance on the role of the AO in JSP 831 was reviewed as part of the re-write of the document for the implementation of the new Service complaints system. The need for additional guidance or training is kept under review.</p>	
2011	11.7	Redundancy Complaints – SCPs/IMs	Given that Service personnel do not have the right to make a claim to an Employment Tribunal (ET) about unfair selection for redundancy, and in the light of the provisions in the Armed Forces Act 2011 for fully independent member Service Complaint Panels (SCPs), I recommend that the use of Independent members for redundancy related Service complaints should be considered by the Review as a matter of urgency. I also recommend that the Services consider the option of having a Defence SCP for redundancy related Service complaints.	<p>The current redundancy programme is complete. It is still considered unnecessary to have a specific MOD redundancy Service complaints approach, and there is sufficient scope within current legislation to include independent members if a Service considers it necessary.</p> <p>Under the new process, if no independent member is included in consideration of a Service Complaint and the complainant considers that to be maladministration of some form he/she can approach the SCO when the internal process is complete. That offers the opportunity for specific circumstances to be reviewed rather than imposing a blanket process that may not be required in all cases. Lessons learned can then be fed back in to policy.</p>	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2011	11.8	PACCC – Policy Complaints	I recommend that the proposal to reduce delay in the handling of complaints about policy in relation to pay and allowances, put forward, in 2011, by the Service Veterans and Personnel Agency (SPVA) be considered as part of the Review and with expedition.	<p>Since this recommendation the pay and allowances complaints process has been reviewed and revised by the SPVA to make it shorter and quicker. How the special to type processes operate alongside the new complaint system will be considered as part of the Service Complaints reform work leading to implementation, in particular whether all complaints should be dealt with under the statutory Service complaints process.</p> <p>While it is right that we should aim to remove any duplication created by having separate systems, further work is required to determine if that is achievable. Further discussions are needed with the individual process leads on the detail of how transition to a single complaints procedure might be achieved in future.</p> <p>If this proves to be the case, then alignment and assurance of the separate processes would obviously be advantageous in terms of consistency of approach and fairness.</p> <p>See Recommendation 14.8 below for outcome of STT review conducted by MOD in 2015.</p>	
2011	11.9	Phase 2 Establishment Complaints	I recommend that the MOD should undertake some further analysis and work to try to find out the reasons for the higher levels of complaint making in Phase 2 establishments; and that the RTS questionnaire includes a question on levels of awareness of the SCC.	Partially complete. An RTS question has been included – see Recommendation 12.13. No work has yet been done on the first part of this recommendation.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2012	12.1	JPA – 3rd Audit (Scope)	The third DIA audit should check the proper use of the JPA module and that it supports the recording of informal complaints to secure efficiency savings. The audit should also include use of the new Management Information tool, which provides a time and resource efficient means for production of good management information.	<p>The DIA audit concluded in July 2015 and reported that satisfactory progress had been made towards implementing the agreed management actions from the previous audit.</p> <p>A new JPA Service complaints process was implemented on 1 Jan 16 to reflect the new Service complaints system that came into effect on that day. The new JPA process incorporates several changes highlighted by the SCC/SCO in her annual reports including: the ability to differentiate between complaints resolved informally or withdrawn; the ability to record complaints on complaints; the alignment of terminology with policy; and the introduction of functionality to allow the recording of those complaints that started out as STTs.</p>	
2012	12.10	Unfair Discharge/Unfair Selection for Redundancy Complaints – SCPs/IMs/SCO	All Service complainants alleging unfair discharge, including unfair selection for redundancy, should have the option of seeking an independent scrutiny of their complaint, whether by the inclusion of an independent member of a Service Complaint Panel or by an Armed Forces Ombudsman.	This has been overtaken by the introduction of the Armed Forces (Service Complaints and Financial Assistance) Act 2015 and the subsequent introduction of the new Service complaints system and creation of the Armed Forces Service Complaints Ombudsman.	
2012	12.11	Whistle-blowers (Lawyers/Medical/Police/SCO)	The Defence Medical Service should establish a provision for whistle-blowers in the new Defence Medical Services complaints policy. This should also be considered for Service lawyers and Service police. These policies could be considered in conjunction with an Armed Forces Ombudsman.	JSP 950, leaflet 1-2-13 (Raising Concerns, Including Whistleblowing by Defence Medical Services Personnel) details the policy and processes to be followed by all staff working within or employed by the DMS in raising and acting on concerns (including by whistleblowing), about safety, malpractice or wrongdoing that affects others.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2012	12.12	Communication of SCC Role (RAF)	The RAF should adopt the Army's best practice of mentioning the SCC on every recruit training course and welfare literature; and consider how to reach RAF personnel with such information over the next year.	<p>All Phase 1 Training (Recruit Trg) courses are briefed on the SCC and Service Complaints.</p> <p>Training is also provided at Phase 2 Training to all specialists who need an in-depth knowledge of the SCC and Service Complaints. Part of their training is to communicate the detail to the personnel which they administer on their Stations/ Units.</p> <p>The RAF have made a huge effort to communicate the role of the SCC and Service Complaints to all personnel. This has come from the Air Force Board, to AOCs, to all Station/Unit Commanders and is briefed to all OC Support Wings and their staffs as they take up post. The RAF have also added the subject of checks on registers; JPA usage and Station/Unit handling to their Annual Assurance review of Stations/Units; and literature has been produced and made available.</p> <p>In assessing progress against this recommendation, the SCC reported in her 2013 report that AFCAS 2013 had shown a slight increase in awareness of the SCC role.</p> <p>As part of the introduction of the new Service complaints system and the introduction of the Ombudsman, the RAF have communicated the changes in process and Ombudsman role.</p>	



Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2012	12.2	Complaints Analysis (Type & Gender)	Each Service should analyse its data on formal Service complaints and informal complaints, scrutinise the subject matter of those complaints, together with any other Service specific information and consider what action should be taken to ensure that all Service personnel, regardless of their gender, are treated with respect throughout their career.	Work in this area has developed since this recommendation was made with more consideration being given by each Service to what data on complaints can tell them about for example the effectiveness of its values and standards training. See in particular the work that the Army is doing in relation to recommendation 13.6 and to 13.3.	Only the RAF has provided data on Service complaints closed informally.
2012	12.3	JPA – Ethnicity Data	The Services should consider with the SCC and MOD, whether and how data could be provided by ethnicity for 2013.	The Services provided this data to the SCC for the 2014 annual report.	
2012	12.5	JPA – 3rd Audit (AO Data)	The third DIA audit should also check the timing of the offer of an AO, to ensure that AOs are offered before a complainant formalises a Service complaint; and as part of their process of checking the point at which complaints are recorded.	See comments on DIA audit at Recommendation 12.1.  The appointment and role of the AO is set out in the new JSP 831. The new JPA Service complaints system now has a mandatory field requiring the offer of an AO to be recorded at the Specific Officer stage of the process.	
2012	12.6	Role of AO	The role of the AO should be reviewed as recommended in 2011, with the provision of better guidance and/or training.	The guidance on the role of the AO in JSP 831 was reviewed as part of the re-write of the document for the implementation of the new Service complaints system. The need for additional guidance or training is kept under review.	
2012	12.8	Cost Assessment of Complaints System	The review by the MOD, Services and SCC of the new 24 week time target should include an assessment of the cost of the complaints system.	The review is scheduled for 2016 when the effect of the new system can also be taken in to account.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2012	12.9	PACCC – Interface with Complaints System	The MOD, Services and SPVA should consider the interface between the pay complaints and Service complaint system as part of and following the SPVA review. They should also consider how the establishment of an Armed Forces Ombudsman might simplify and speed up resolution of such complaints, particularly where large numbers of individuals are involved.	See Recommendation 14.8 below for outcome of STT review conducted by MOD in 2015.	
2013	13.1	JPA – 3rd Audit (Scope)	The third DIA audit of the Services' use of JPA, recommendation 12.1 in the SCC's Annual Report 2012, should take place in the calendar year 2014. That audit should also consider the concerns raised by the SCC in her Annual Report 2012, including the potential for non-recording of Service complaints later resolved informally and pressure to record as withdrawn complaints which were resolved and closed.	See comments on DIA audit at Recommendation 12.1.  The issue regarding the ability to record and differentiate between complaints resolved informally and withdrawn was resolved in the update to JPA in 2015.	
2013	13.2	JPA – Ethnicity Data	The Services should provide information to the SCC annually from 2014 onwards on types of complaints by ethnicity.	The Services provided this data provided to SCC for 2014 annual report.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2013	13.5	Types of Complaints and Changes Made to Handling Process (RAF)	As part of its assurance and monitoring, the RAF should consider changes in patterns and types of complaints, so as to be able to assess and inform the SCC of the impact of changes it has made to the handling of Service complaints. As empowerment of the chain of command is perceived to be part of the solution to a more effective and efficient handling of Service complaints, the RAF should share its findings with the other Services.	<p>The RAF have made progress in a number of areas in 2014. These include the active encouragement of COs to take ownership of grievances, and to resolve them as quickly as possible and at the lowest appropriate level. To support this work, a seminar was held at RAFC Cranwell in Nov 15, supported by the SCC, Chief of Staff Personnel and Director Legal Services.</p> <p>The RAF have also used the Defence Lessons Identified Management System to good effect to make changes to the manner in which they handle complaints. For example, it was used to highlight a significant E&amp;D concern present within a small trade that may have wider Services learning benefit, resulting in appropriate interventions outside the Service complaint system.</p> <p>They are also pursuing other initiatives to tackle the cause of complaints. These include a Gender Related Behaviour Study and a Through Life Mental Health Support Study to review the RAF's provision of welfare support to Regular and Reserve personnel.</p>	All three Services have a cell looking at patterns and trends.

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2013	13.6	Bullying & Harassment (Army)	The Army should give a higher priority to its work in understanding and eliminating bullying, harassment and discrimination and should take a holistic approach similar to that undertaken by the Australian Defence Force.	<p>A number of work-strands are under way to better understand the background to complaints of this nature in the Army e.g. Sexual harassment survey, and to identify meaningful ways to tackle what comes out of that work. The Army's project team work is still under way.</p> <p>In Sept 15, the CGS Army Leadership Code was launched to all Regimental Sergeant Majors and COs. Key to the new code is the Army's ability to tackle unreasonable behaviour, including bullying, harassment and discrimination – see the link below for further information.  <a href="http://www.army.mod.uk/news/27973.aspx">http://www.army.mod.uk/news/27973.aspx</a></p>	
2014	14.1	Bullying & Harassment (Army)	The Army should seek to gain greater insight into the number of people who feel intimidated to complain about improper behaviour, share the findings of their review into bullying, harassment and discrimination with the Commissioner and take appropriate remedial action as necessary.	Addressing unacceptable behaviours is a major focus of the Army's drive to maximise its talent – the Army's efforts are being driven by the Chief of the General Staff (CGS). A project team was formed in September 2014 to examine bullying, harassment and discrimination (BHD) and identify ways to reduce inappropriate behaviours; it will report to the Executive Committee of the Army Board (ECAB) in Summer 2015 and will suggest a range of measures to combat unacceptable behaviour. It is clear that leadership sits at the heart of this issue and CGS will host a Leadership Conference in September 2015 at which he will launch his campaign to take the Army's leadership from 'great to greater'. The BHD Project Team Leader has briefed the SCC twice on the project's work and will provide a further briefing on completion.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
				<p>The Army is determined to create an environment where its people feel able to complain and acknowledges there are some who currently feel unable to do so. The reasons for people's reluctance to complain are complex and we constantly seek opportunities to understand and address the issues. Recent surveys of Army personnel have focused on this issue and feedback from 'Respect for Others' Training provides commanders with a view of the willingness or otherwise of people to complain and the reasons behind any reticence. Most recently the Army's Climate Assessment policy has been refreshed and should start to add to our understanding. Every opportunity is being taken to share knowledge of this issue with the Army's chain of command and make the changes required to improve the situation.</p> <p>In Sept 15, the CGS Army Leadership Code was launched to all Regimental Sergeant Majors and COs. Key to the new code is the Army's ability to tackle unreasonable behaviour, including bullying, harassment and discrimination – see the link below for further information.  <a href="http://www.army.mod.uk/news/27973.aspx">http://www.army.mod.uk/news/27973.aspx</a></p>	
2014	14.2	Statistics working group	A working group should be formed drawing together representation across MOD, the Services and the Commissioner's Office to provide greater assurance on the statistical information provided.	A Service Complaints Statistics Group was formed in March 15 to provide a strategic lead in determining the data capture requirements of MOD and the SCO. The group meets quarterly and membership comprises representation from MOD, each of the three Services and the SCO's office.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2014	14.3	Lessons from low-level resolution	The Services should record the number of complaints which, having been withdrawn or informally decided, go on to become formal Service complaints. They should also consider how recommendations made at the lower levels and on informal resolutions can be captured and good practice in complaint-handling disseminated more widely.	<p>See comments on DIA audit at Recommendation 12.1.</p> <p>For informal complaints there is capability to record and distinguish between those informally resolved and withdrawn on the Joint Personnel Administration (JPA) system. Current policy sets out the requirement for all complaints to be recorded and maintained on the system throughout the life of a case. The capability to record the informal remedy of a formal Service complaint was introduced in line with the reforms made to the Service complaints system.</p> <p>MOD will consider whether and if so how it could be possible to record whether informal complaints go on to be formal service complaints and how lessons might be captured, without having a negative impact on the efficiency of the overall process.</p>	
2014	14.4	Demographic information	In order to get a more accurate picture about the origin and type of complaints from Black, Asian and Minority Ethnic (BAME) Service personnel, the Services should explore the possibilities of distinguishing between complaints from foreign and Commonwealth Service personnel, British BAME Service personnel and religious persuasion, where declared.	This information is recorded on the Joint Personnel Administration (JPA) system and can be linked to individual Service complaints.	
2014	14.5	Benefit management strategy	The MOD should produce a clear benefits management strategy for Service complaints reform in order to ensure that the new system addresses the problems it was designed to, taking into account that some change will evolve as the system beds in over its first few years. The creation of an Ombudsman is not the end of the process.	A benefits plan has been in place since May 15, and the performance and effectiveness of the new system will be monitored against these benefits from its introduction in Jan 16 through to 2020.	

Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2014	14.6	Secondary legislation	The MOD should pursue secondary legislation at the earliest opportunity, allowing full consultation with the SCC and clarifying matters that were discussed during the Parliamentary process.	All secondary legislation was approved by Parliament in 2015, and the new Service complaints system, including the creation of the first Service Complaints Ombudsman, was implemented on 1 Jan 16. The Commissioner's office was fully involved in this work.	
2014	14.7	Transition arrangements	The MOD should make a prompt decision on arrangements around the transition to Ombudsman which affect Service personnel with complaints in the system and ensure that these are effectively communicated within the Services during the transition period.	<p>The Armed Forces (Service Complaints and Financial Assistance) Act 2015 (Transitional and Savings Provisions) Regulations 2015 provide for how Service complaints are to be processed that were made before 1 Jan 16 and had not been fully concluded by that date under the old system – guidance on how to apply the transition arrangements is also set out in JSP 831.</p> <p>Individual complainants have been told how the changes affect their existing complaint.</p>	



Year	Rec.	Subject Matter	Recommendation	MOD progress report in 2015	Status
2014	14.8	Special To Type (STT)	The MOD should ensure that 'Special To Type' complaints (complaints relating to housing, medical matters or pay) benefit from the new arrangement and are not delayed by additional processes	<p>MOD undertook a review in 2015 of the STT complaints processes to see whether, and if so how, complainants under these processes might be able to benefit from the new Service complaints system. That review concluded that the greater benefit overall was in maintaining the status quo in relation to these STT processes.</p> <p>The three STT processes are successful in resolving a large volume of the complaints that they receive, and have either recently undergone or are about to undergo significant changes to their procedures. Where these changes have already been implemented, in the pay and allowance process, they have delivered an increasingly effective system, and in turn has both the capacity and expertise to process a significant number of cases/complaints effectively. It is hoped that the upcoming review of the medical/dental and accommodation complaints procedures will result in similarly efficient and effective procedures.</p>	

## Appendix C

### Statistics

## Chapter 1: The work of the Service Complaints Commissioner for the Armed Forces

### Complaints to the SCC in 2015

This section summarises key trends regarding contacts made to the Office of the Service Complaints Commissioner (SCC) and the referral function of the SCC. Guidance on the Service complaints process and key terms used can be found in 'Guide to Service Complaints Statistics' at **Annex F**.

#### Key findings:

<b>Sharp fall in contacts to the SCC</b>	Contacts to the SCC fell by 34% in 2015, with subsequent falls in potential complaints and referrals to the Services.
<b>Most potential complaints relate to prescribed behaviour</b>	Close to three-quarters of potential complaints received relate to prescribed behaviour – this has increased consistently since 2012.
<b>Around two-thirds of open referrals are over a year old</b>	At the end of 2015 around 460 referrals remain open – 61% are at least a year old (i.e. received in 2014 or earlier).

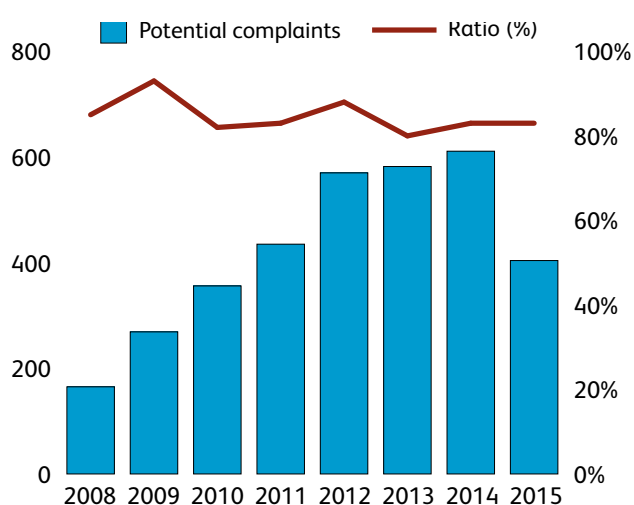
#### Contacts to the Office of the Service Complaints Commissioner

During 2015 the SCC received 488 contacts, down 34% on the previous year (732). The fall comes after consistent increases between 2008 and 2014, bringing contacts back to levels previously seen in 2010/2011.

#### Potential complaints

Of the total contacts received, 83% were considered as potential complaints (404) – this ratio is consistent with that seen in previous years.

**Figure 1.1:** Potential Service complaints and ratio (%), 2008–2015



The remaining 17% of contacts were considered out of scope, e.g. complaints by the public or matters not relating to Service life.

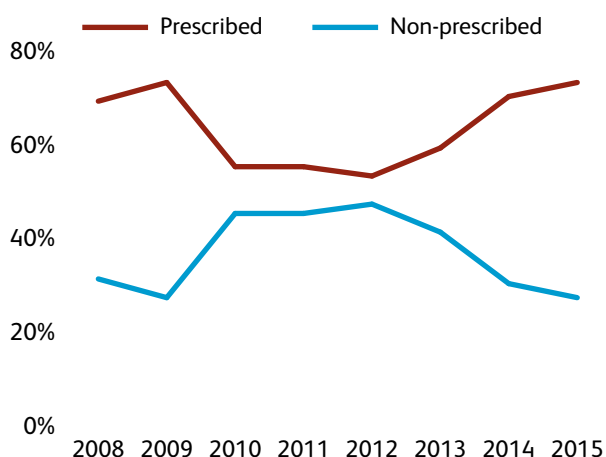
**Gender:** 14% of potential complaints received by SCC were made by female personnel, stable with previous years. This continues to be disproportionate to the 11% female representation in the UK Armed Forces (regular and reserve).<sup>3</sup>

**Rank:** The composition of potential complaints by rank has remained reasonably stable. Around half (48%) of all complaints were made by Non-Commissioned Officers (NCOs) and Warrant Officers and equivalent. Just over a third (35%) of complaints came from Privates, up from 25% in 2013.

**Behaviour type:** Around **three-quarters** of potential complaints relate to prescribed behaviour – this has increased consistently since 2012 (53%). This includes bullying, harassment, discrimination, bias, dishonesty, victimisation and other improper behaviour. Of all allegations made in prescribed complaints the majority relate to improper behaviour (56%).

<sup>3</sup> UK armed forces biannual diversity statistics: 2015, Ministry of Defence

**Figure 1.2:** Potential Service complaints by behaviour type, 2008–2015



### Referral decisions made by the Commissioner during 2015

In line with falls in potential complaints the number of referrals made by the SCC decreased by 40%. A total of 280 referrals were made, falling to levels previously seen in 2010/2011.

Around 70% of potential complaints were referred to Services during 2015 – this has remained broadly consistent since 2008.

The remaining 30% of potential complaints were not referred due to:

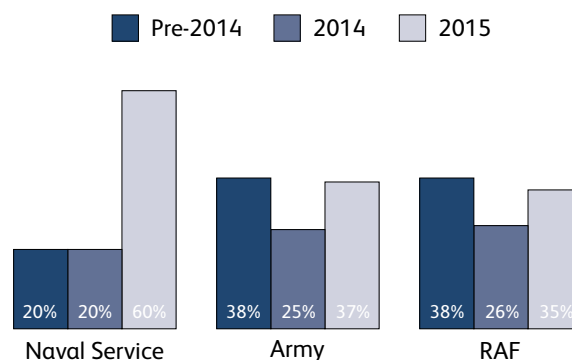
- SCC being unable to pursue a referral due to lack of information (22%);
- the Commissioner deciding not to refer a complaint (7%);
- insufficient time to refer 'new cases' (2%).

### Referral outcomes

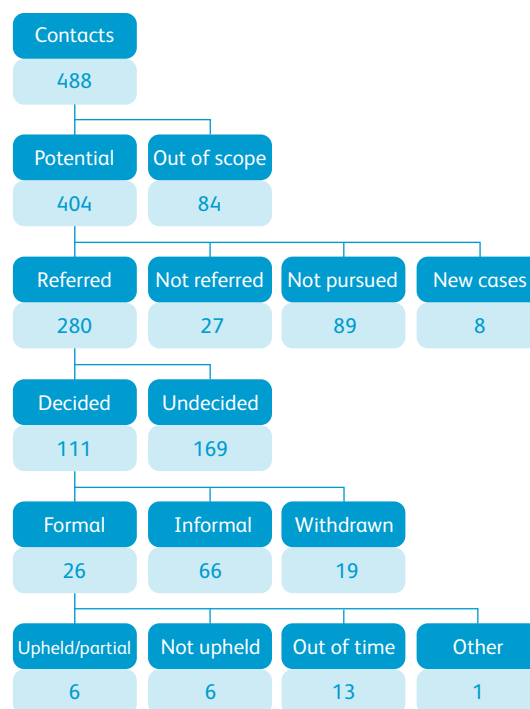
The Service complaints process has a target of 24-weeks (around 6 months) and as such the majority of referrals are not resolved in the same year as they are opened – of the 280 referrals made in 2015, 40% reached an outcome in 2015.

At the end of 2015 close to 460 referrals remained open – this represents 19% of all referrals made since 2008. Around 60% of all open referrals are over a year old (e.g. were received in 2014 or earlier). This varies across Services with a higher proportion of 'older' open cases seen in the Army and RAF compared to the Naval Service.

**Figure 1.3:** Open referrals by year of receipt and Service (%), 2008–2015



**Figure 1.4:** Flow chart of SCC activity in 2015



## Chapter 2: The work of the Service Complaints System

This chapter includes an overview of Service complaints handled by the Armed Forces during 2015. Guidance on the Service complaints process and key terms used can found in 'Guide to Service Complaints Statistics' at **Annex F**.

Relevant individual Service breakdowns are reported here where appropriate, however separate individual Service factsheets can be found at the following link:

<http://www.servicecomplaintsombudsman.org.uk/service-complaints-ombudsman/publications-and-reports/annual-reports/>

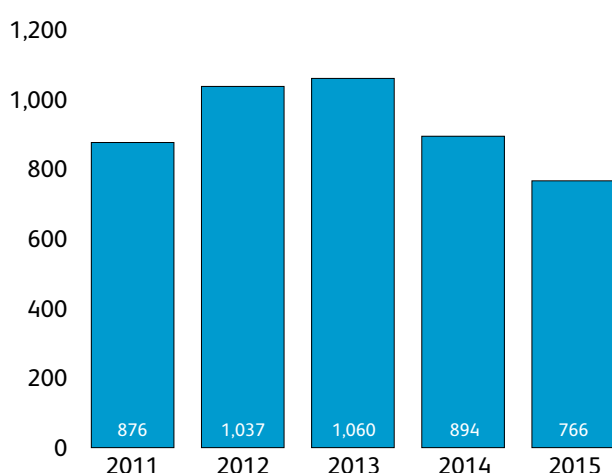
### Key findings:

<b>Continued fall in complaints received into SC system</b>	Complaints entering the SC system fell by 14% compared to the previous year. This follows similar falls seen in 2014 (16%) following a peak in complaint receipts in 2013.
<b>Female and BAME personnel overrepresented as complainants</b>	The disproportionate representation of female and BAME personnel as complainants (19% and 11%) compared to representation in the Armed Forces (11% and 7%) continued in 2015. Bullying, discrimination and harassment were more commonly the cause of complaints for these groups.
<b>Timeliness remained stable, well short of 90% target</b>	Tri-service, 47% of complaints were closed within 24-week target, with increases seen in both Naval Service and RAF (17 and 12 percentage points respectively).

### Volume

Total Service complaints received fell 14%, down from 894 in 2014 to 766 in 2015 – this continues the fall seen since a peak in receipts in 2013.

**Figure 2.1:** Complaints received, tri-service, 2011–2015



The largest relative reduction was seen in the RAF where 40% fewer complaints were received compared to the previous 12 months (from 155 to 93).

Throughout 2015 the SCC has worked with the Ministry of Defence to devise a common counting basis for the statistics in our reporting. Enhancements made to the way that Services calculate closed and open cases mean that **any comparison with previous reports is not possible**. As a result closed and open complaint trends given here are sourced from the Service complaints management information provided by Defence Personnel Secretariat, Ministry of Defence.

During 2015 the number of complaints closed by Services remained broadly stable, whereas complaint receipts fell. The average monthly volumes suggest that around 60 complaints were received and 80 were closed each month during 2015.

The total number of open cases in the Service complaints system fell by 12% during 2015. Falls were seen for both Level 1 and Level 2 complaint types. However, the number of open Level 3 complaints increased by 42% compared to December 2014. This was largely due to a 57% increase in the Army and reflects policies put in place to address legacy cases in the lead up to the SC system reform in 2016.

All Services show falls in the number and proportion of 'historic' open cases throughout 2015 – the number of open complaints received prior to 2014 fell by around 50%.

### Box 2.1: Armed Force Continuous Attitude Survey (AFCAS) 2015

The volume of complaints alone does not necessarily reflect levels of 'wrongs' occurring within the Services – rather this reflects wrongs experienced by those willing and able to submit a complaint. The findings of the AFCAS survey can supplement the complaints data and provide a broader understanding of how service personnel feel regarding fair treatment within the Armed Forces. The full report is available here: <https://www.gov.uk/government/statistics/armed-forces-continuous-attitude-survey-2015>

#### Key findings:

- Around **13%** of personnel surveyed report experiencing bullying, harassment or discrimination in last 12 months.
- Of these only **10%** go on to make a formal complaint regarding the experience – this varied across Services, with the lowest rate seen in the RAF (**7%**).
- The most common reasons given for not making a formal complaint were feeling that 'nothing would be done' (**34%**) and that complaining would adversely affect a respondent's career (**31%**).
- For those who did complain, most were dissatisfied with the complaint outcome (**61%**) and the time taken to resolve the complaint (**61%**).
- Awareness of the Service Complaints Commissioner remained stable – however awareness in 'Other ranks' fell, particular in the Royal Navy (down 6 percentage points).

**Complaints by type:** The category of Service complaint is determined by the Services on receiving the complaint – each complaint has a single, 'primary' category. 'Terms and Conditions of Service' continues to be the most common complaint type, accounting for 46% of complaints received in 2015.

Bullying complaints increased by 5 percentage points, however this coincided with a sharp fall in harassment (down 9 percentage points).

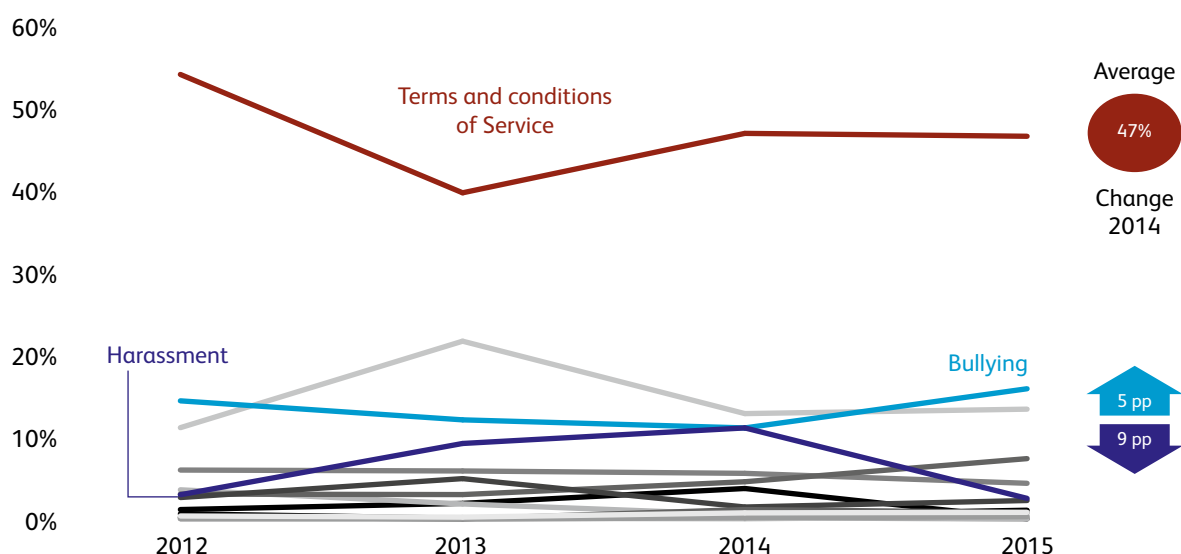
#### Complaints by complainant demographic

**Gender:** As with complaints to the SCC, the proportion of complaints received from female personnel continues to be disproportionate to their representation in the UK Armed Forces (regular and reserve).<sup>4</sup> Around 19% of complaints were submitted by female personnel, despite making up 11% of the Service strength.

Bullying, discrimination and harassment were more commonly the cause of complaints received from female personnel. Around 42% of complaints from female personnel relate to these categories compared to only 20% for male personnel – this difference was true across all Services.

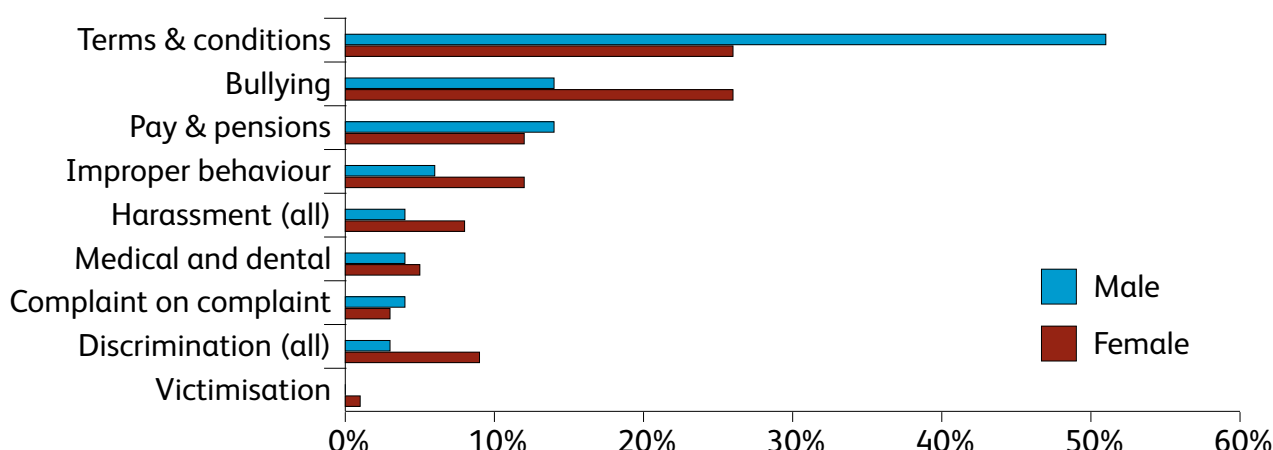
Sexual harassment and discrimination were more commonly the reason for complaints being entered from female compared to male personnel (6% and 1% respectively) – this difference was in keeping with findings from the Army Sexual Harassment Survey (see Box 2.2).

Figure 2.2: Complaints received by type, tri-service, 2012–2015



4 UK armed forces biannual diversity statistics: 2015, Ministry of Defence

**Figure 2.3:** Complaints received by gender and type, tri-service, 2015



### Box 2.2: Army – Sexual Harassment Survey 2015

During 2015 the Army undertook a survey to gather information on the perceived prevalence of sexual harassment within the service. The full report is available at the link below: <https://www.gov.uk/government/publications/british-army-sexual-harassment-report-2015>

#### Key findings:

- Sexualised behaviour is common throughout, however Servicewomen are more likely than Servicemen to experience it and perceive it as offensive.
- 13% of Servicewomen suffered a 'particularly upsetting experience', compared to 3% of Servicemen. Only 3% of those suffering an upsetting experience made a complaint.
- The most common reasons for not complaining include feeling they could 'handle the situation myself', being labelled a troublemaker and the possible impact on their career.
- Of those who did complain over half were dissatisfied with how well the outcome was explained to them (57%) and how well they were kept informed of progress (51%).
- Close to 90% stated that an effective way to deal with sexual harassment is to have a '*complaints procedure that works*'.

**Ethnicity:** The proportion of complaints received from BAME personnel (Black, Asian or Minority Ethnic) continues to be disproportionate to their representation in the UK Armed Forces (regular and reserve).<sup>5</sup> Tri-service 11% of complaints were entered by BAME personnel despite accounting for 7% of the UK Armed Forces population.

As with female personnel, bullying, discrimination and harassment were more commonly the cause of complaints received from BAME personnel compared to White personnel. Around 20% of complaints from White personnel relate to these categories compared to 50% for BAME personnel – this difference was true across all Services and most evident in the Army (23% for White, 54% for BAME).

#### Handling of complaints

**AO allocation:** There was a small increase in Assisting Officers (AOs) appointments – up 3 percentage points on the previous year to 65%. The largest increase was seen in the Army, up 27 percentage points to 70% appointments made.

Where AOs are not being appointed it was largely due to the complainant declining the offer (94%), as opposed to not being offered an AO at all (6%).

<sup>5</sup> UK armed forces biannual diversity statistics: 2015, Ministry of Defence

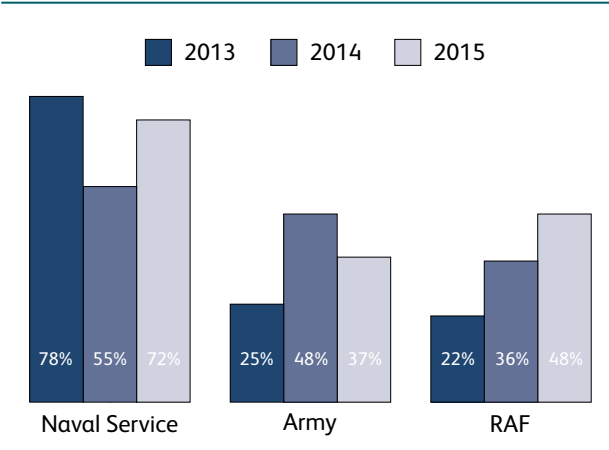
**Outcome:** Of complaints accepted and decided during 2015, 35% were not upheld. This was down 7 percentage points on 2014 and proportionally more complaints were upheld (including partially).

Just under a third of complaint outcomes were withdrawn by the complainant or resolve pre-decision – this has remained stable since 2013. The Army had the highest relative level of withdrawn or resolved pre-decision outcomes, 42% compared to 20% in the Naval Service and 16% in the RAF.

For the first time the Services were able to separately identify complaints which were resolved pre-decision. The initial tri-service data shows that the use of resolution pre-decision is low, with only 10 outcomes recorded in 2015 – representing 1% of all outcomes.

**Timeliness:** Tri-service the percentage of complaints closed within the 24 week target period has remained stable at 47% – well short of the 90% target.

**Figure 2.4:** Complaints dealt with in 24 weeks by Service, 2013–2015

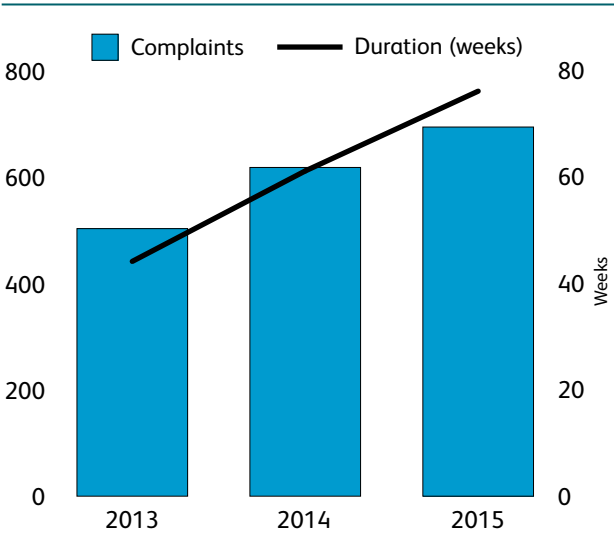


The Naval Service and RAF show increases in the proportion of complaints closed within the target period, up 17 and 12 percentage points respectively on the previous year. The Army reported a decrease of 11 percentage points, down to 37% – the lowest of each of the Services.

**Red flag report:** In 2013, the SCC introduced a new reporting system to provide better visibility of cases which had exceeded, or were likely to exceed, the 24-week target. At the end of 2015 there were around 690 complaints open beyond the 24-week time target – this represents an increase of 12% on the previous year. This increase was largely due to a 33% rise in Army red flag cases at the end of 2015, whereas the Naval Service and RAF both reported falls, down 50% and 28% respectively.

The time that red flag cases spent open also increased – up 24% from an average of 61 weeks to 76 weeks. The majority (70%) of red flag cases were open for more than double the initial 24-week target – this is a 9 percentage points increased on December 2014 (61%).

**Figure 2.5:** Red flag complaints and median duration open, 2013–2015





**Box 2.3: Defence Internal Audit 2015**

Defence Internal Audit (DIA) has carried out two audits regarding the recording of Service Complaints information by the Armed Forces on the Joint Personnel Administrative (JPA) system in 2008 and 2012. In 2012 DIA were unable to place reliance on the integrity of the data and reported a limited assurance opinion. The latest audit sought to follow up on actions from 2012 and consider concerns raised by the SCC.

**Key findings:**

- Satisfactory progress made towards implementing actions required to improve consistency and quality of data.
- SCC concerns regarding inconsistency and inaccuracy were well founded and reflected the long lead-time required in JPA change processes, reliance on JPA despite inherent design weaknesses and continued inconsistencies (including informal complaints and Special to Type (STT) complaints).
- Lack of confidence in effectiveness of JPA unfounded – marked improvement on case completion times and no anomalous trends.
- Increase in withdrawn complaints more likely result of increased confidence in and uptake of informal resolution as opposed to an adverse outcome (e.g. pressured into withdrawing complaint).
- Continued collaborative work, understanding of requirements and continued availability of dedicated statistical resource saw a step-change towards driving JPA improvements.

## Annex D

### Financial Statement

Financial Statement	Cost (£,000) 2015 Excluding VAT
SCC remuneration*	171
Support staff*	825
Accommodation, IT, telecoms and facilities	489
Office machinery, stationery and consumables	5
Travel and subsistence	8
External communications and media support	–
Annual report production and printing	6
Independent legal advice	2
Training and professional membership fees	10
<b>TOTAL</b>	<b>1,516</b>

\* These costs reflect the capitation rate for each post i.e. the total cost of each position including pay, pension and insurance contributions

## Annex E

### Service Complaints Commissioner Engagements 2015

Prime Minister's Office, HCDC and Ministers		
Date	Engagement	Event/Venue
February	Meeting	Rt Hon Anna Soubry, Minister for Defence, Personnel, Welfare and Veterans
March	Meeting	Rt Hon Lord Astor of Haver, Under Secretary of State for Defence
March, July	Meeting	Madeleine Moon MP Defence Select Committee
February	Meeting	Prime Minister's Special Advisors, Downing Street
March	Meeting	Former Service Chiefs, House of Lords
May, July	Meeting	The Rt Hon Michael Fallon, Secretary of State for Defence
July	Meeting	Rt Hon Earl Howe, Minister of State for the Ministry of Defence and Deputy Leader of the House of Lords
August	Meeting	Penny Mordaunt MP, Armed Forces Minister
October	Meeting	Mark Lancaster MP, Minister for Defence Personnel Welfare and Veterans
October	Meeting	Rt Hon Dr Julian Lewis, Chairman, House of Commons Defence Committee (HCDC) and members of the HCDC.

Senior Service and Civilian Personnel		
Date	Engagement	Event/Venue
February	Meeting	Jon Thompson, Permanent Secretary, Ministry of Defence
February, June, July	Meeting	Admiral Sir George Zambellas, 1st Sea Lord, Royal Navy
March, April, August	Meeting	General Sir Nicholas Carter, The Chief of General Staff, Ministry of Defence
February, September	Meeting	Air Chief Marshal Sir Andrew Pulford, Chief of the Air Staff, Royal Air Force
June, September, December	Meeting	Caroline Pusey/Heather McNaughton, Defence Personnel Secretariat – Policy, Ministry of Defence
February, March, April, August, October, December	Meeting	Lieutenant General Andrew Gregory, Chief of Defence People, Ministry of Defence
February, April, July, December	Meeting	Vice Admiral Sir David Steel/Vice Admiral Woodcock 2nd Sea Lord, Royal Navy
February, July, December	Meeting	Lieutenant General Sir Gerry Berragan, Adjutant General/Major General Rob Nitsch, Director Personnel, British Army
February, May, August, November	Meeting	Air Marshal Sir Baz North, Deputy Commander Capability and Air Member for Personnel, Royal Air Force
October	Meeting	Independent Service Complaints Panel Members

**Royal Navy and Royal Marines**

Date	Engagement	Event/Venue
February	Visit	HMS EXCELLENT, Whale Island, Portsmouth
June	Visit	HMS DUNCAN
June	Visit	Commando Training Centre, Lympstone
June	Visit	3 Commando Brigade, Plymouth
September	Presentation	Naval Servicewomen's Network HMS EXCELLENT, Whale Island, Portsmouth
October	Presentation	Naval Legal Services Termly Employment Law Update, HMS EXCELLENT, Whale Island, Portsmouth

**Army**

Date	Engagement	Event/Venue
February	Visit	Army Headquarters, Andover, Hants
May	Visit	Colchester Garrison
June	Conference	Army Legal Services Training Conference, International Military Law, Defence Academy, Shrivenham

**Royal Air Force**

Date	Engagement	Event/Venue
February	Visit	RAF High Wycombe
July	Visit	Defence Primary Healthcare, Brize Norton
July	Presentation	RAF Senior Leadership Team, RAF Northolt
August	Visit	RAF Northolt
September	Visit	RAF Cranwell
November	Presentation	Air Force Board Standing Committee, Main Building
December	Visit	RAF Marham

**Tri-Service**

Date	Engagement	Event/Venue
July	Visit	British Forces, Cyprus
May	Visit	Military Corrective Training Centre, Colchester
August	Visit	Service Prosecuting Authority, RAF Northolt
September	Visit	British Forces, Joint Force Command, North Atlantic Treaty Organisation (NATO), Brunssum

Ombudsman and International Military Ombudsman		
Date	Engagement	Event/Venue
April	Meeting	Dame Anne Owers, Independent Police Complaints Commissioner (IPCC)
May	Conference	Ombudsman Association Biennial Conference, Loughborough University
June	Meeting	Caroline Wayman, Chief Ombudsman and Chief Executive Financial Ombudsman Services
September	Visit	Ottawa, Canada Mr Gary Walbourne Canadian Military Ombudsman, Mr Parent, Canadian Veterans Ombudsman, Major General Blaise Cathcart, Judge Advocate General Mr Bruna Hamel, Chair of the Military Grievances External Review Committee
September	Visit	Dr Hans-Peter Bartels, German Military Ombudsman, Berlin
June	Conference	Pre-planning Meeting 7th International Conference Ombudsman Institute for the Armed Forces (ICOAF), Prague
October	Conference	7th International Conference Ombudsman Institute for the Armed Forces (ICOAF), Prague
October	Panellist	NATO Science for Peace and Security programme, Workshop on Gender and Complaints within Armed Forces, Headquarters North Atlantic Treaty Organisation (HQ NATO), Brussels

Faith		
Date	Engagement	Event/Venue
September	Presentation	Muslim Conference, Andover, Hants

Media, Family Federations		
Date	Engagement	Event/Venue
March	Interview	British Forces Broadcasting Services
March	Meeting	Bill Mahon Director of RAF Families Federation
March	Meeting	Lt Col (Ret'd) Peter Poole, Director Combat Stress
March	Meeting	Catherine Spencer Chief Executive Officer, Army Forces Federation
April	Meeting	Chris Simpkins, Director General Royal British Legion
April	Interview	Homeport, Naval Families Federation, Portsmouth
April	Interview	Envoy Magazine, RAF Families Federation
July	Meeting	Lt Gen (Ret'd) Sir Andrew Ridgeway, The Confederation of British Service Organisations (COBSEO), The Confederation of Service Charities
August	Interview	The Independent
September	Visit	RAF Families Federation, RAF Wittering
September	Visit	Peter Poole, Combat Stress, Leatherhead, Surrey

## Defence Conferences

Date	Engagement	Event/Venue
July	Conference	Women in Defence UK: Encouraging Diversity
October	Conference	Service Prosecuting Authority Conference, RAF Northolt
December	Conference	Whitehall & Industry Group – Taking Diversity and Inclusion beyond Women on Boards – Case Studies
December	Conference	Women in Defence UK: Overcoming Adversity

## Accepted Invitations

Date	Engagement	Event/Venue
June	Regimental Dinner Night	Army Legal Services Regimental Dinner Night, Shrivenham
October	Annual Dinner	Naval Legal Services Annual Dinner, HMS PRESIDENT
October	Annual Dinner	RAF Directorate of Legal Service Annual Dinner

The following list of web sites contains information in the form of publications and/or statistics relating to the Service complaints process that may be of interest.

Website: <http://armedforcescomplaints.independent.gov.uk>

Ministry of Defence	<a href="https://www.gov.uk/government/organisations/ministry-of-defence/">https://www.gov.uk/government/organisations/ministry-of-defence/</a>
	This site provides information on the organisations within the defence system, reports and data, and guidance.
Ministry of Defence Service complaints information	<a href="https://www.gov.uk/guidance/armed-forces-service-complaints-process">https://www.gov.uk/guidance/armed-forces-service-complaints-process</a>
	This site provides information and guidance on the service complaints process.

Details of Ministry of Defence Statistical and Research publications, most of which can be viewed on-line, can be found at: <https://www.gov.uk/government/organisations/ministry-of-defence/about/statistics>

For historic publications, see the links to 'earlier volumes in the series' on individual publication pages.

Further Information on the individual Services covered by the Service complaints system can be found at:

Royal Navy	<a href="http://www.royalnavy.mod.uk/">http://www.royalnavy.mod.uk/</a>
British Army	<a href="http://www.army.mod.uk/">http://www.army.mod.uk/</a>
Royal Air Force	<a href="http://www.raf.mod.uk/">http://www.raf.mod.uk/</a>



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Alternative formats are available on request from  
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Statistical enquiries	020 7877 3452 Statisticsmanager@servicecomplaintsombudsman.gsi.gov.uk
Complaints	020 7877 3450 contact@servicecomplaintsombudsman.gsi.gov.uk

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