
Annual Report **2021**

Annual Report 2021

Presented to Parliament pursuant to Section 340O of the *Armed Forces Act 2006*, as amended by the *Armed Forces (Service Complaints and Financial Assistance) Act 2015*, c.19.

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Our mission

To provide independent oversight and investigations in support of an effective Service Complaints process for members of the UK Armed Forces.

Our vision

That all Service personnel have access to, and confidence in, a Service Complaints system that is efficient, effective and fair.

Our customer charter



Respect

We will treat you with courtesy and respect at every stage of the process and we expect you to treat our staff in the same way.



Communication

We will always ensure that the information we provide is clear and easy to understand. This includes information about our role and what we can and cannot do. We expect you to provide the information we ask for and to be honest in your communications with us.



Impartiality

We will undertake all aspects of our work fairly and impartially as an independent body.



Transparency

We will always act openly and transparently and will publish information about our work and the Service Complaints system. In doing this, we will never compromise confidentiality.



Improvement

We will continually look to improve the service we offer and listen to the feedback you provide. We hope that you will help us achieve this by responding to our requests for feedback at the end of the process.

The full version of SCOAF's customer charter can be found on our website <https://www.scoaf.org.uk/about-us/customer-charter/>.

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Foreword from the Ombudsman



Dear Secretary of State,

I am pleased to present the Annual Report for 2021, covering my first year in post as the Service Complaints Ombudsman. Unfortunately, this report finds once again that the system is not yet operating in a way that is efficient, effective or fair.

The Services have invested considerable time and effort into reducing the number of open Service Complaints within the system and considering more efficient ways of working. There have been several improvements in the performance of the Service Complaints system this year and a significant amount of work is ongoing to improve the experience of those using the system. I have been extremely pleased with the openness and enthusiasm demonstrated by each of the Services and the Ministry of Defence in welcoming me into this role and engaging with my office on areas of mutual interest. These efforts, and the continued commitment to improving the system, are to be commended.

However, it remains the case that delays within the Service Complaints system and the overall time taken to resolve complaints are a key concern. Trust in the system remains low, and Service personnel are not yet comfortable engaging in the Service Complaint process – nor do they have confidence that the correct outcome will be reached. To that end, further work is needed before the system can be reported to be efficient, effective and fair.

There has been a significant focus this year on culture within the Services, including the House of Commons Defence Committee (HCDC) report on Women in the Armed Forces. I recognise the importance of this work and the need to ensure improvements in the lived experience of Service personnel. I also note the work completed by the Service Complaints Transformation team in seeking amendments to the Armed Forces Bill to enable future changes to the Service Complaints process. Nevertheless, I am disappointed with the overall progress made to date on Service Complaints reform.

The recommendations I have made in this year's Annual Report, therefore, focus on the need to drive forward the commitment to progress outstanding recommendations and deliver real change and improvement to the Service Complaints system.

SCOAF delivered several performance improvements this year, and progress against the 2021 Business Plan is positive – including an increased level of outreach and a dedication to sharing learning and insights with the Services. There is still more work to be done to eliminate our backlog and to ensure that SCOAF stands ready to engage with the Ministry of Defence and the Services in driving forward reform and improvements.

I remain fully committed to the importance of ensuring that Service personnel have access to a Service Complaints system that serves them well and supports their need. Despite the findings of this report, I am confident that with renewed passion and dedication, further significant improvements can be made – and I look forward to playing an active role in moving this forward.

A handwritten signature in black ink, appearing to be 'MH', written in a cursive style.

Mariette Hughes

Service Complaints Ombudsman for the Armed Forces



Message to my team

2021 was a year of significant change for SCOAF. In addition to the arrival of a new Ombudsman, we have relocated our office, completed the move to a new case management system, and transitioned to a new IT system – whilst continuing to face the challenges brought about by the COVID-19 pandemic. I am incredibly grateful to the resilience shown by my team, and the unwavering dedication to providing a quality service.

Dealing with a change in leadership is never easy, however I have been welcomed with openness, enthusiasm, and honesty at every turn. The team have been absolutely invaluable in facilitating a smooth transition, and I could not have asked for more.

In welcoming a new Ombudsman, new Strategic Objectives had to be set – plotting the course for what SCOAF wants to achieve during my tenure. Through collaborative workshops, staff from across SCOAF contributed to developing our objectives, demonstrating their commitment to the important work we do, and taking personal pride in their part in delivering that vision.

The office move and new IT provision were significant projects which, delivered poorly, could have had an immeasurable impact on our ability to provide a quality service. However, thanks to the exceptional work of SCOAF staff, both projects have been successfully delivered, putting us in good stead for the future. My thanks go to all staff for their part in this, but in particular to my Head of Office and the Business Team for ensuring SCOAF can continue to deliver our outputs.

Operationally, performance has seen significant improvement on previous years, in the context of an increased demand for our services. This is a significant achievement, and I would like to thank the entire operations team for the fantastic work they have delivered this year, and my Head of Investigations for providing invaluable support and management over the last 12 months.

I am extremely proud of what we have achieved this year, and I hope that my team shares in that pride. I look forward to continuing the good work of SCOAF together over the rest of my tenure.



Executive summary

The Service Complaints Ombudsman for the Armed Forces' Annual Report 2021 reports on the work undertaken by her office throughout 2021, and the current state of the Service Complaints system.

Efficient, effective and fair

In making this assessment, the Ombudsman takes into consideration a number of factors, including:

Efficient		
Deals with complaints at the lowest suitable level		
Resolves complaints within the allocated timeframes and without undue delay		
Operates to keep up with demand		
Effective		
People have knowledge of the complaints process		
People have confidence in the complaints process		
Has clarity of purpose		
Is flexible and proportional		
Acts on the results of complaints and lessons learned to bring about change		
Fair		
Is independent and impartial		
Has openness and transparency		
Is accessible		
Does not disadvantage or discriminate		
Achieves appropriate outcomes		
Good performance The Service Complaints system is performing well in this area.	Moderate performance The complaints system has made improvements in this area, but further work is required. Issues preventing a higher assessment may be outside of the immediate Service Complaints process.	Poor performance The complaints system is performing poorly in this area.

The work of the Service Complaints system

The Service Complaints system is an internal workplace grievance system for members of the Armed Forces in the United Kingdom. The information below reflects the work of this internal process.

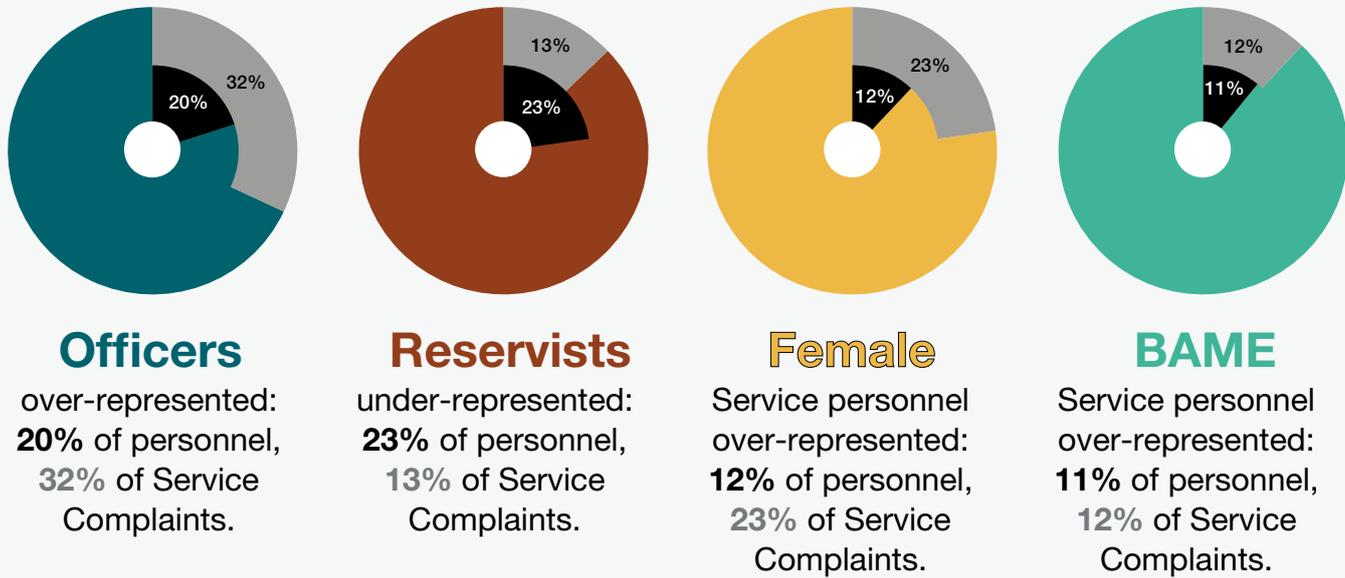
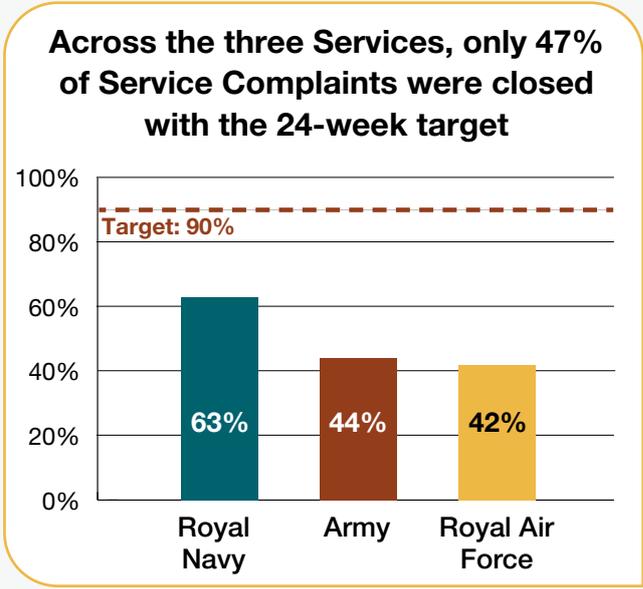
749 Service Complaints ruled admissible in 2021

1 in 265 Service personnel raised a Service Complaint

8 out of 9 applications result in a complaint being investigated

50% of Service Complaints are upheld

All Service Complaints are judged on the merits of the case

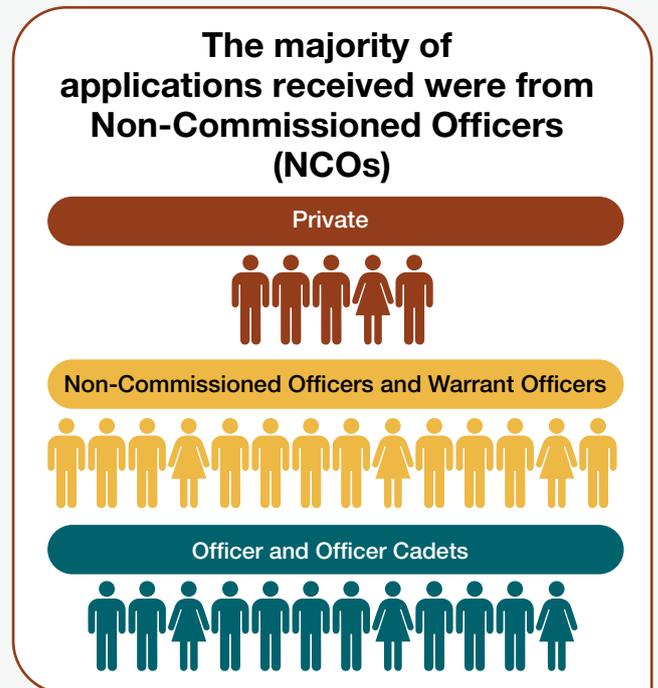
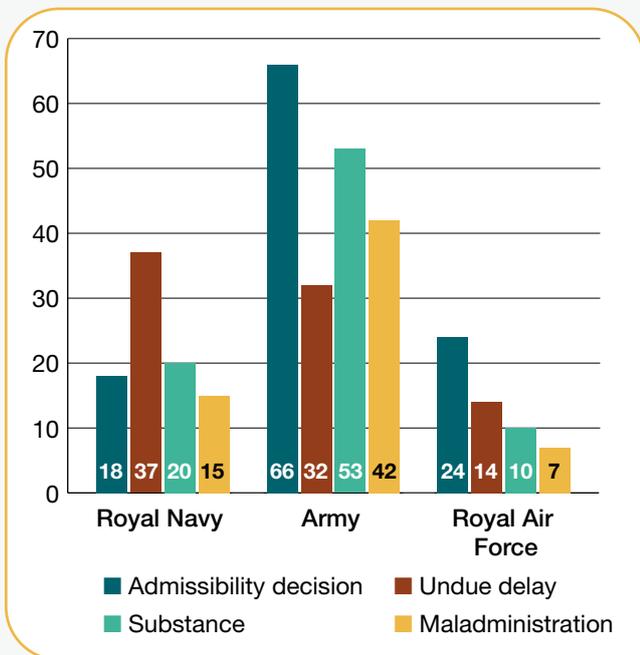


The work of SCOAF

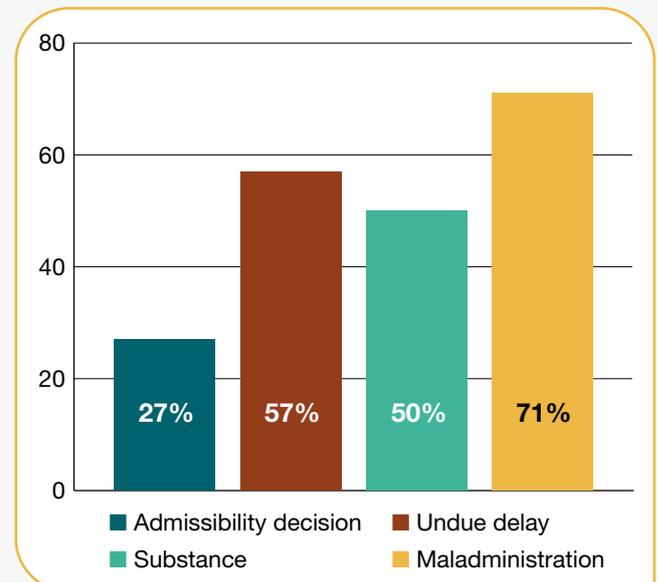
The Service Complaints Ombudsman for the Armed Forces provides independent and impartial oversight of the Service Complaints system.



Number of SCOAF investigation applications received in 2021 by type and Service



Percentage of SCOAF investigations upheld in favour of the complainant by type, 2021



Chapter 1 – Efficient, Effective and Fair: The Ombudsman’s Assessment

Since 2008, as a commissioner and as an Ombudsman, we have been reporting on the Service Complaints system and assessing whether it is operating in a way which is efficient, effective and fair. To date, we have not been able to conclude that this is the case, and 2021 is no different.

The Ombudsman considers that the Service Complaints system is still not efficient, effective, nor fair.

Significant focus is placed on the timeliness Key Performance Indicator (KPI) as an external measure of how the system is performing. However, to provide appropriate redress and resolution to Service personnel, all three strands of the efficient, effective and fair assessment must be considered. The system must show itself to be efficient in its handling and processing of complaints, ensuring that those using the system are not disadvantaged because of operational failings. The system must be effective, meaning that it achieves the purpose it is designed for. And finally, the system must be fair for all and reach the correct outcomes.

In this year’s Annual Report, the Ombudsman has considered the efficient, effective and fair measures against her experiences and interactions with the Services during the year, along with the Ombudsman Association’s principles of good complaint handling. As a result, these measures have been refined and updated.

Whilst the core principles of good complaints handling remain unchanged, the refined measures for efficient, effective and fair reflect a more nuanced way of assessing the operation of the reformed Service Complaints system.

Efficient	
Deals with complaints at the lowest suitable level	
Resolves complaints within the allocated timeframes and without undue delay	
Operates to keep up with demand	
Effective	
People have knowledge of the complaints process	
People have confidence in the complaints process	
Has clarity of purpose	
Is flexible and proportional	
Acts on the results of complaints and lessons learned to bring about change	

Fair		
Is independent and impartial		
Has openness and transparency		
Is accessible		
Does not disadvantage or discriminate		
Achieves appropriate outcomes		
Good performance The Service Complaints system is performing well in this area.	Moderate performance The complaints system has made improvements in this area, but further work is required. Issues preventing a higher assessment may be outside of the immediate Service Complaints process.	Poor performance The complaints system is performing poorly in this area.

Efficient

An efficient complaints system is one that:

- Deals with complaints at the lowest suitable level.
- Resolves complaints within the allocated timeframes and without undue delay.
- Operates to keep up with demand.

Deals with complaints at the lowest suitable level

Across the Services, individuals are encouraged to resolve complaints at the lowest possible level. To this end, options for mediation and informal resolution are available, in addition to Special-to-Type¹ (STT) processes for certain types of complaints. Joint Service Publication (JSP) 763² has been amended this year to better reflect the recommended approach to informal resolution of grievances, which is welcomed by SCOAF.

A survey of Service Complaints system users who contacted SCOAF indicated that:

- (i) 41% of those who were complaining about bullying, harassment or discrimination had tried to resolve matters informally; and
- (ii) only 31% had tried mediation. Available information to accurately assess the level of uptake of informal resolution is limited, as the current system is not set up to record complaints that are resolved at the lower levels of the Service Complaints process.

1 Special-to-Type JSP 831 – For complaints about pay and allowances, healthcare and housing (this list is not exhaustive), there are other complaints processes (known as STT processes) to be followed before engaging the Service Complaints process

2 JSP 763 - Behaviours and Informal Complaint Resolution

There is a perception that there are two separate, distinct processes – low level resolution, and formal Service Complaint investigations. The Ombudsman considers that all grievances should be recorded as part of the Service Complaints system. This would enable better tracking of outcomes and streaming to the appropriate method of resolution for individual complaints.

On receipt of an Annex F form/statement of complaint, the Services would be able to consider and record whether STT processes must be followed first, whether the individual is open to mediation and/or local resolution, or whether a full investigation is appropriate. This would support the collection and analysis of a much wider range of data relating to Service Complaints.

Recommendation



The Ministry of Defence engages with SCOAF in order to amend Joint Service Publication 831 – Redress of Individual Grievances: Service Complaints³, particularly the Annex F: Service Complaint form to ensure a consistent approach in the recording of all grievances.

When a formal Service Complaint is ruled admissible and taken forward for investigation, the majority (72%) are decided at Decision Body (DB) level, with just over one quarter (28%) going through to appeal.

The responsibility for deciding the complaint sits with the DB, who must be authorised to make the decision and grant appropriate redress. However, those who are appointed as the DB often do not have the capacity to investigate the complaint alongside their other duties. In most cases, an Investigation Officer (IO) is appointed to investigate any complaint on the DB’s behalf, compile the evidence and report the findings to the DB.

The Ombudsman understands that additional resource has been allocated to increase the availability of IOs and appreciates that this is intended to reduce delay in the system. However, reducing the number of handovers within a complaint system improves efficiency by reducing the likelihood that complaints are sent back for further investigation. Furthermore, IOs are not empowered to offer redress in the same way that the DBs are, which means that once cases are passed to an IO, opportunities for informal resolution may be lost.

On this basis, SCOAF acknowledges the importance that IOs play within the current system, particularly in the context of reducing the time taken for investigation. However, the Ombudsman considers that this should not be viewed as a permanent solution and should be kept under review.

Observation



The Ministry of Defence may wish to consider whether, in addition to the proposal to establish a pool of permanent DBs (recommendation 3.8), these DBs are directly tasked with the investigation of the case.

Resolves complaints within the allocated timeframes and without undue delay

The KPI for timeliness within the Service Complaints system requires that 90% of complaints are resolved within 24 weeks of being ruled admissible. This target leaves a 10% allowance for Service Complaints that are too complex to be resolved within this time. This does not include the time taken to make a decision on the admissibility of a Service Complaint. However, this remains an important stage, particularly from the perspective of those raising the complaint.

Therefore, when investigating complaints about delay in the handling of a complaint, SCOAF considers the time taken for the admissibility decision to be made, as well as the time taken to resolve the complaint.

SCOAF understands that, on occasion, issues will occur which mean the Services are unable to resolve a matter within the recommended timeframes. When SCOAF investigates undue delay, the fact that a case may have missed the 24-week target does not automatically lead to a finding of undue delay. Undue delay occurs when there is significant delay or inactivity on a case, for which there is no good reason, and which has caused an injustice to the complainant.

Delays at admissibility

Guidance⁴ says an admissibility decision should be made by a Specified Officer within ten working days of a statement of complaint being acknowledged. While statistical data on this is limited, information from SCOAF investigations suggests this still remains an issue with the average⁵ time taken tri-Service for admissibility decisions to be made remaining at ten weeks.

The Ombudsman is pleased to note the success of the RAF's Centralised Admissibility Team, which by the end of the year had succeeded in bringing the average time taken for an admissibility decision down to seven working days, which is commendable.

Delay within the Service Complaints system

For cases that have been deemed admissible, the overall timeliness figure in 2021 was 47%, which represents an improvement compared with last year's figure (40%) and is to be commended. However, to date, no Service has succeeded in achieving 90% of cases closed within 24 weeks. Timeliness for the single Services was at 63% for the Royal Navy, 44% for the Army and 42% for the RAF.

The efficiency of the system must be measured not only in terms of performance against the KPI, but also in terms of the overall experience of everyone using the system. For this reason, SCOAF considers that the average resolution time of complaints is equally as important as the percentage of cases resolved within 24 weeks. In 2021, Service Complaints took an average of 36 weeks to be resolved, which is a slight improvement from last year (37 weeks) but is still some way off the 24-week target. Of note is the time taken to resolve bullying, harassment or discrimination complaints (52 weeks), which is 44% longer than the average time taken.

4 JSP 831 version 2.0: Part 2 Chapter 3

5 Median

The Services must be transparent about what they are doing in order to progress the older cases within the system and to resolve delays.

Recommendation



The Services should submit a quarterly progress report to SCOAF setting out the age profile of open cases, and explaining what steps are being taken to reduce delays and progress older cases.

SCOAF remains extremely concerned with the average time taken to resolve cases that go to appeal. Whilst it is accepted that appeals add extra time to the resolution of complaints, the average time taken between the DB decision and final Appeal Body (AB) determination is estimated at 50 weeks⁶. This situation clearly does not provide timely resolution of complaints for the 28% of cases that go to appeal, which take on average 75 weeks to be resolved.

In relation to undue delay, in 2021 SCOAF completed 83 investigations into an alleged undue delay as discussed in Chapter 3. 57% of those investigations found there was undue delay in the handling of the complaint.

Of the cases investigated by SCOAF, the main reasons leading to findings of undue delay were periods where no progress had been made; and the failure by the Service to provide any explanations for the delays. Other reasons for delay include the time taken to obtain legal advice, staff shortages in the Secretariats, and the need for further investigation following disclosure.

Service Complaints should be resolved within a reasonable time and without undue delay to avoid unnecessary anxiety to both the complainant and respondent.

Operates to keep up with demand

This year the Services have seen a small increase in the number of Service Complaints ruled admissible (3% rise). However, the Services have managed to close more Service Complaints (810) than they ruled admissible (749). This is to be commended, and the efforts made by each Service are addressed in more detail in Chapter 2.

Operating to keep up with demand goes further than dealing with the number of Service Complaints currently raised in-year. The data shows that many who consider they have cause to complain do not do so. Should confidence in the system increase, it is reasonable to assume that more individuals will come forward with their complaints. Therefore, the system must have some regard to what increased demand may be coming down the line in the future and be able to plan for this.

It is also noteworthy that a common theme in undue delay cases is the time taken for legal advice to be provided. In some cases, where reasonable steps are taken to mitigate this,

⁶ SCOAF does not collect direct information on the exact time taken between the DB decision and final AB determination. Instead, this figure of 50 weeks has been estimated as the difference between the average time to resolve a Service Complaint which has been appealed (75 weeks) and the average time to resolve a Service Complaint which has not been appealed (25 weeks).

SCOAF may not consider this to be undue delay. This is because it is understood that the staffing and workload of the legal team fall outside the remit of the Service Complaints system.

However, the frequency at which the Services are requesting legal advice on cases remains a concern for SCOAF. The Ombudsman does not go so far as to recommend that legal advice should not be requested on Service Complaints; however, it is her view that the Services could apply a far more pragmatic view to the need to request legal advice on cases. If the Services hold the view that the level of legal advice currently sought is appropriate, it follows that delays caused to the progress of Service Complaints due to awaiting legal advice must form part of the assessment of the Service Complaints system in future annual reports.

SUMMARY – is the system efficient?

When considering the efficiency of the Service Complaints system in 2021, the Ombudsman has looked at the resources, timeliness and procedures used to handle a complaint. As noted in previous annual reports, there are longstanding issues of undue delays, and the system is not currently able to keep pace with demand. Therefore, whilst some improvements have been made this year, the Ombudsman cannot report that the system is efficient.

Effective

An effective complaints system is one where:

- People have knowledge of the complaints process.
- People have confidence in the complaints process.
- The system has clarity of purpose.
- The system is flexible and proportional.
- The system acts on the results of complaints and lessons learned to bring about change.

People have knowledge of the complaints process

For a complaint system to be effective, people must have knowledge of it. They need to know how it works, how it can help them and understand how to use it.

Overall awareness

In 2021, the Ombudsman conducted several visits to initial training establishments which allowed her to gauge the level of knowledge personnel had about Service Complaints and their ability to raise these. It was confirmed during these visits that information about the Service Complaints process is provided during all initial training.

However, this level of awareness reduces once individuals have completed their initial training. The Armed Forces Continuous Attitudes Survey (AFCAS) reported that 96% of personnel were aware of the Service Complaints process. However, only 21% said they knew

a lot about it. 57% knew a little, and 18% said they had heard of it but knew nothing about it. Awareness of SCOAF is at a lower level, with 26% saying they had never heard of the Ombudsman, and a further 22% saying they had heard of SCOAF but knew nothing about it.

This must be taken in the context that not all Service personnel will raise a Service Complaint, therefore arguably may not need in-depth knowledge of the system and how it operates. On this basis, the general level of awareness that a system does exist is encouraging, if individuals who have cause to complain are then able to access the right information to be able to raise their complaint.

However, SCOAF’s own feedback survey of those who had contacted SCOAF/used our website shows that more than half of the survey respondents were dissatisfied with the amount and availability of information provided by the Services in relation to Service Complaints. 45% of the survey responders who weren’t involved in a Service Complaint⁷, said information on Service Complaints was not easy to find. 70% of the same group said their training had not provided adequate awareness of the Service Complaints process and the existence of the Ombudsman.

“ I wasn’t aware of the SCOAF until I discussed my concerns with my Line Manager and he showed me the relevant links/webpages and was really helpful. I feel the option to submit a service complaint isn’t well publicised to junior ranks. ”

This year, SCOAF has reissued printed media campaigns to reflect the appointment of the new Ombudsman. In addition, SCOAF recorded several awareness videos which were distributed to each Service to use in training events. These videos are designed to provide simple, clear information to Service personnel about their right to complain and their right to access our services. The videos will be uploaded to the SCOAF website in due course.

The Ombudsman has also undertaken several outreach visits and engagements this year (full details of which are available at Appendix D) in order to increase the visibility of SCOAF and engage directly with Service personnel. Every year the Ombudsman is invited to present at each of the Services’ courses for new Commanding Officers. During 2021 the Ombudsman presented at four Commanding Officers Designate Courses (CODC)/Future Commanders Study Periods (FCSP). These presentations provide an important opportunity to not only explain the role and function of the Ombudsman, but to emphasise the critical role that Commanding Officers have in making the complaints process work. While outreach is a vital part of the Ombudsman’s role, the Services should continue to ensure that information about the Service Complaints system is available and accessible.

The role of Assisting Officers (AOs)

It is recognised that not everyone will be comfortable or familiar with the process of raising a complaint, which is why it is the policy that all those involved should be offered the support of an AO. The purpose of AOs is to support and guide both complainants and respondents through the Service Complaint process.

⁷ Involvement in a Service Complaint includes being the complainant, respondent, Assisting Officer or the decision maker for the Service Complaint

Information provided by the Services⁸ indicates that 5% of personnel who had submitted bullying, harassment or discrimination Service Complaints had not been offered the support of an AO. However, 18% of those responding to SCOAF's feedback survey who were involved in bullying, harassment or discrimination complaints⁹, said they had not been offered this service.

For those who have been provided with AOs, views on the value added by this role vary. The AFCAS survey reported that 20% of those complaining of bullying, harassment or discrimination were dissatisfied with the support provided by their AO, compared with 51% last year, which shows an improvement. However, 48% of those responding to SCOAF's feedback survey, who were involved in bullying, harassment or discrimination complaints¹⁰ said they were unhappy with the support received from their AO. These figures will be kept under review, as it is not clear at this stage whether there is a correlation between individuals being unhappy with the outcome of their complaint and approaching SCOAF, and them being dissatisfied with the support offered by their AO.

One possible reason for satisfaction ratings with AOs not being higher may be related to how helpful AOs find their training. 78% of the AOs who responded to SCOAF's feedback survey said they did not find the training they had received to be helpful in terms of enabling them to perform the role of AO.

People have confidence in the complaints process

For individuals to have confidence in the complaints process, they have to believe that their complaint will be taken seriously, handled properly, investigated thoroughly, and that a fair outcome will be reached. They also have to feel confident that they will not face any adverse impact as a result of raising their complaint.

AFCAS reported that 11% of personnel experienced bullying, harassment or discrimination in the last 12 months. However, 89% of those individuals did not go on to make a complaint. These figures have not changed significantly since last year.

The reasons given for not raising complaints were overwhelmingly that personnel did not believe anything would be done about it (55%) and that complaining would adversely affect their career (49%).

During outreach visits, individuals also told the Ombudsman that in cases where their concerns involved another person, they often considered it easier to just 'wait it out' until that person was posted elsewhere – and remarked that this would be faster than going through the Service Complaints process.

The report "Women in the Armed Forces from Recruitment to Civilian Life"¹¹ published in July 2021 highlighted concerns about issues and complaints being 'swept under the carpet', rather than being taken seriously or dealt with. Furthermore, 73% of those responding to

8 Statistics from the Services' annual statistical returns to SCOAF, which are based on the Joint Personnel Administration case management system.

9 This figure includes both complainants and respondents in such complaints, whereas the Services' percentage is for complainants only.

10 Complainants and respondents.

11 [Women in the Armed Forces: From Recruitment to Civilian Life \(parliament.uk\)](https://www.parliament.uk)

SCOAF’s feedback survey who had been involved with a Service Complaint, would not recommend others to use the Service Complaints process.

SCOAF only sees a small proportion of cases, compared with the total number of Service Complaints investigated by the Services. However, in the majority of substance and maladministration applications we investigate, we uphold allegations of maladministration and find failings with the way cases have been handled and/or investigated. This is of great concern and must be addressed to improve confidence in the system.

The system has clarity of purpose

The Ministry of Defence published the Service Complaints Easy Read Guide¹² in 2021, which is a positive step. The guide sets out the various stages of a Service Complaint investigation, along with the personnel involved, in a way that is simple and easy to understand.

However, 87% of those responding to SCOAF’s feedback survey who had been a complainant with a Service Complaint still did not find the process simple.

One of the key issues currently facing the Service Complaints system is that individuals do not clearly understand how informal resolution of grievances and the STT processes sit alongside the submission of an Annex F/Service Complaint form. JSP 831 sets out that: *‘the aim of the Service Complaints system is to provide Service personnel with a process that is efficient, effective and fair through which they can resolve valid grievances on matters relating to their service in the Armed Forces and can seek redress’*.

“ The Special to Type Complaints processes need to be overseen by an independent body. This caused an 18-month delay in the submission of the service complaint and caused a great deal of emotional distress for the complainant. ”

Discussions with the Services and key stakeholders around the Service Complaints system tend to focus only on formal Annex F submissions, along with DB and AB determinations following full investigations. However, the purpose of the system should be about the resolution of all individual grievances, through whichever method is most appropriate. This could be local resolution by the chain of command. Others may be suitable for mediation, while others may require an admissibility decision and a full Service Complaint investigation.

The Ombudsman believes that Service personnel should be able to record any grievance by submitting a simplified Annex F form, as a single point of entry into the system to allow the most appropriate resolution.

12 Service Complaints Easy Read Guide.pdf (publishing service: gov.uk)

Recommendation



That the Ministry of Defence reframe the Annex F form to be a single point of entry for all grievances which sit outside of the Special to Type process, allowing them to be streamed to the most appropriate method of resolution.

The system is flexible and proportional

All complaints are unique to the individual circumstances, and those involved will have differing needs. In order to be effective, a complaints system should be flexible enough to adapt the approach in order to support resolution.

Whilst consistency of approach is useful in understanding how complaints are being resolved, currently all complaints that are considered admissible seem to follow the same process. 78% of complainants responding to SCOAF's Service Complaints feedback survey said the system did not take account of their individual circumstances. Consideration needs to be given to different styles/approaches to investigation and resolution – particularly in relation to bullying, harassment or discrimination complaints when much of the supporting information will be direct witness evidence. In the Ombudsman's experience bullying, harassment or discrimination complaints take longer to investigate, largely because of the number of respondents and the emotive nature of comments made, which often leads to retaliatory disclosure comments.

It may be the case that certain situations give rise to the need for slightly different approaches. Provided the overarching principles of good complaints handling are followed, and decisions to deviate from standard process are clearly understood and recorded, this may aid speedy resolution and improved levels of satisfaction with the process.

It is not proportional for the appeal stage of the process to take 50 weeks compared with the target of 24 weeks. The Ombudsman accepts that in some cases, further investigation at appeal may be required. However, consideration needs to be given to a more proportionate and pragmatic approach to appeals. SCOAF notes the intention of proposed changes to the Armed Forces Bill to ensure that grounds for challenge of the DB's decision are clearly defined when raising an appeal. The Ombudsman looks forward to working with the Ministry of Defence and the Services to ensure these changes are implemented in such a way as to support the fair but proportionate investigation of appeals.

The system has taken on some flexibility in terms of ability to interview complainants and respondents remotely. Some teams have also become fully paperless – however, the Service Complaints process as a whole is not, which is causing delays and increasing the time taken for files to be compiled. SCOAF still receives paper files from the Services in the majority of cases, which impacts our ability to become fully paperless.

In last year's Annual Report, SCOAF made the observation that the Services should be looking for ways to utilise technology and reduce reliance on paper to facilitate remote and flexible working. The Ombudsman would welcome the opportunity to discuss possible solutions that could be implemented tri-Service to address this issue and move towards a paperless Service Complaints system.

Although the regulations are fairly straightforward in terms of when complaints can be considered admissible, there are certain situations in which it might be considered ‘just and equitable’ to allow a complaint to proceed outside of the usual timeframes. SCOAF has noted that admissibility letters often do not demonstrate that the Specified Officer has considered the exceptional circumstances presented by complainants in deciding whether to allow a complaint to proceed. This adds to a perception that the system is too rigid and does not consider individual circumstances.

Observation



The Ministry of Defence and the Services may wish to conduct some work to understand the common blockers, delays and resolution trends in different types of complaints, in order to agree where alternative approaches may be beneficial.

The system acts on the results of complaints and lessons learned to bring about change

The Ombudsman is satisfied that individual recommendations are acted on when SCOAF has investigated. However, the underlying issues which lead to complaints remain the same. There has been very little wider cultural change, particularly around the experience of female and BAME personnel. Whilst SCOAF notes the response to the HCDG report ‘Women in the Armed Forces’, it is concerning that one in ten women are still reporting that they have experienced sexual harassment.

The Ombudsman is also disappointed that a formal response highlighting the findings of the study into the lived experiences of BAME personnel has not been forthcoming. This study was published in May 2021 with a copy provided to the Services, the Ministry of Defence and the Ombudsman. SCOAF was advised at the time that a paper would be taken to the Defence People Leadership Team on this matter, but as of yet has received no further update on how the cultural issues identified will be addressed.

In relation to admissibility decisions made by Specified Officers, SCOAF continues to see the same mistakes being made. SCOAF has produced a shared learning resource to address this and will continue to develop further guidance in the future. One issue is that many people handling Service Complaints, either as Specified Officers or DBs, may be doing so for the first time and are unfamiliar with the process and the previous wider learning points highlighted by SCOAF. Unfortunately, there are few complaint handling experts within the Services who can drive continuous improvement.

Whilst amendments to the Armed Forces Bill are still progressing, these represent minor changes to the underlying legislation, to allow other aspects of the process to be amended in the future. Overall, the Ombudsman considers the speed and dedication to improvement of the system has been lacking and cannot currently say that the system is acting on lessons learned to make changes.

The Ombudsman met with the Ministry of Defence Service Complaints Transformation team several times throughout the year and found them to be receptive to ideas and collaboration, but the fact remains that reform is simply taking too long. There are still eight recommendations made by the Ombudsman in previous annual reports outstanding, a

number of which address the most fundamental issues in the Service Complaints system. Some of these have been open since 2016, and we are still no further forward. Work has begun to review the suitability of the KPI. However, there have been no concrete proposals for a new format or target.

Recommendations

This year the Ombudsman has made four recommendations. Further details are in Chapter 4 of the report.

The Ombudsman accepted in 2020 that COVID-19 may have impacted work on the outstanding recommendations but is disappointed that progress on the implementation of these remained minimal in 2021. As an example, recommendation 4.2 in the 2019 Annual Report focused on the need to review how data in the Service Complaints system is collected and managed. This recommendation was accepted and was to be taken forward by the Service Complaints Transformation team. However, the quarterly updates on this recommendation did not change significantly throughout 2021 and the Ombudsman is not clear on how and when this work will be taken forward.

Other recommendations have been updated by the Ministry of Defence to say that they *'will be conducted when all proposals and structure of the revised system is finalised'*, or *'will be completed when the work of the review is completed'*. It is not clear when this is expected to be, and the Ombudsman is concerned that insufficient focus is being placed on the Service Complaints system.

Other recommendations which have been marked as rejected because alternatives were preferred have still not achieved the desired outcome. For example, SCOAF's recommendation 2.4, made in 2017, stated that better guidance and training be provided to personnel involved in making decisions as part of the Service Complaints process, including Specified Officers, DBs and ABs, on decision writing for complaints handlers. The intention being to reduce delays and mistakes.

This was rejected on the basis that legal advice would be provided on each case, so guidance and training would not be required. Despite this, the same mistakes occur and the over reliance on legal advice causes delays in the system. The inexperience and lack of training for those handling complaints continues to be an issue.

Until such time when there is a clear commitment to acting on the recommendations made by SCOAF and within acceptable timeframes, improvements will not be made. This requires a renewed degree of focus and oversight.

Recommendation



The Ministry of Defence commits to substantively concluding all open and accepted recommendations made by the Ombudsman prior to Annual Report 2020, within 12 months of this report (Annual Report 2021). Quarterly meetings between the Ombudsman, Chief of Defence Staff and Chief of Defence People should take place in order to provide assurance to SCOAF on the level of progress being made, and so that issues preventing progress are clearly articulated, understood and mitigated.

SUMMARY – is the system effective?

The Ombudsman found there is varied knowledge and understanding of the Service Complaints process amongst personnel, and notes confidence in the system is still poor. Furthermore, work to improve the system has not progressed since last year’s Annual Report. For this reason, the Ombudsman cannot report the system as being effective.

Fair

A fair complaints system is one that:

- Is independent and impartial.
- Has openness and transparency.
- Is accessible.
- Does not disadvantage or discriminate.
- Achieves appropriate outcomes.

Is independent and impartial

Independence

SCOAF provides independent and impartial oversight of the Service Complaints system. In 2021, the Ombudsman has not identified any significant concerns over the independence of the system. However, it is clear there is still an issue of perceived lack of independence of the Service Complaints system. Complainants express concern over the chain of command being involved in the resolution of complaints, as well as concern that SCOAF is not truly independent from the Ministry of Defence.

The Defence Sub-Committee on Women in the Armed Forces' report¹³ was sufficiently concerned about this issue to recommend removing the chain of command entirely from the complaints process in cases alleging bullying, harassment or discrimination. This repeated the recommendations of the Report on Inappropriate Behaviours by Air Chief Marshal Wigston CBE in 2019¹⁴ for an Independent Defence Authority to look at these types of complaints. This is supported by the findings of the AFCAS survey which noted that 50% of complainants who alleged bullying, harassment or discrimination were unhappy with the perceived fairness and objectivity with which their complaint was handled.

This recommendation has not been accepted by the Ministry of Defence. A number of alternative propositions are being taken forward, including: an outsourced investigation service which is independent of the Ministry of Defence; centralised admissibility teams; and the requirement for independent members to sit on all appeal boards for cases involving complaints of bullying, harassment or discrimination¹⁵. Furthermore, all Service Complaints of a sexual nature will be required to be dealt with outside of the direct chain of command. The Ombudsman looks forward to reviewing the potential success of these propositions in improving the system.

In terms of the independence of SCOAF, it is of utmost importance that an Ombudsman sits outside of the sector which it has oversight of. In order to address perceptions around independence, the Ombudsman published a blog setting out how SCOAF operates. Further to this, work is underway to establish a public facing framework agreement, setting out the nature and extent of interactions between SCOAF and the Ministry of Defence. It is anticipated that this will be published in early 2022.

Impartiality

In order for a Service Complaints system to be fit for purpose, the decisions made must be impartial. The Ombudsman has observed occasions where DBs and ABs have strayed too far in their consideration of matters, commenting on incidents and facts which fall outside of the specific complaints to be considered. Whilst the Ombudsman acknowledges the need to demonstrate an understanding of all the issues at play, reference to matters not related to the specific complaint, such as the complainant's past conduct or personality are not appropriate. Such instances give rise to concerns that DBs and ABs are not considering complaints impartially. Where the Ombudsman has observed this, feedback has been given to the relevant individuals.

Just as importantly, the system must be perceived by users to be impartial. The Ombudsman has noted that on occasion, the language used within DB and AB decisions could appear to be biased or convey a slightly negative tone. This in turn can affect an individual's impression of how their complaint has been handled.

13 [Women in the Armed Forces: From Recruitment to Civilian Life \(parliament.uk\)](https://www.parliament.uk/publications/2019/06/women-in-the-armed-forces-from-recruitment-to-civilian-life)

14 [The Wigston Report on Inappropriate Behaviours: Wigston review \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418811/wigston-report-on-inappropriate-behaviours.pdf)

15 [JSP 831 Part 1 Version 2.0 Chapter 1](#)

“ It is my belief that the entire Service Complaints process is open to corruption as it is all handled by officers rather than an outside, and therefore, independent and uninfluenced party. ”

Has openness and transparency

Of those responding to SCOAF’s feedback survey, 94% of surveyed complainants and 76% of surveyed respondents did not find the Service Complaint process open and transparent. The responses also showed that 79% of surveyed complainants and 66% of surveyed respondents did not think that the appropriate amount of evidence was collected to enable a fair decision to be made.

The Ombudsman considers that this relates to the management of expectations at the start of an investigation, in terms of clearly explaining what will be investigated and what evidence will be central to determining the issues.

This can also be seen in complainant dissatisfaction with outcomes when the DB or AB agree with the sequence of events that is complained about, but do not consider the individual to have been wronged. The Ombudsman encourages the Services to consider explaining at the outset the evidence required and the approach that will be followed when deciding whether or not to uphold a complaint. There is also a lack of information available as to the likely redress that can be achieved through the Service Complaints process. The Services may wish to consider how they can provide enhanced, easy to understand information, setting out what individuals can expect from the process and the potential outcomes.

An important factor in pursuing openness and transparency is ensuring that the complaint is fully understood at the outset of an investigation. SCOAF previously recommended in its 2017 Annual Report that it be made an explicit step in the Service Complaints system that the Specified Officer speaks to a complainant at the outset to establish the nature of the complaint. The Ministry of Defence accepted this and noted that the Services have agreed that where the Specified Officer is not available, and by exception, the Specified Officer interview could be delegated to a suitably empowered representative to ensure that the interview took place. In spite of this, 48% of complainants responding to SCOAF’s Service Complaints Feedback Survey said that they did not have an initial interview. The Ombudsman would like to emphasise the importance of these interviews in establishing the scope and nature of the complaint.

It is important to note that even when the Ombudsman determines that the correct decision was reached by an AB, the explanations for these decisions were sometimes unclear and could be better with plain English. On occasion, the rationale behind the determination is not clearly explained and lacks adequate analysis. 52% of SCOAF’s surveyed complainants said the final decision was not explained well. This can affect a complainant’s willingness to accept a decision if they cannot understand the reasons for it.

“ The DB chose not to speak to me. I think this could have sped up the process. If nothing else, it would have been nice to have had the decision letter explained to me. ”

Another factor affecting openness and transparency is the importance of providing meaningful updates. 69% of SCOAF’s surveyed complainants did not receive regular and informative updates on the progress of their complaint, despite this being a clear requirement in the guidance (JSP 831). The Ombudsman has noted many occasions where monthly updates on complaints do not give any information as to what is happening on a complaint, or what the next steps are and how long this may take. This leads to a perception that the Service is hiding information, or that no progress is actually being made.

Is accessible

SCOAF provides an important function in referring complaints into the system, to ensure that all Service personnel are able to access it. Further information on the number of referrals made by SCOAF is provided in Chapter 3. In addition, this year SCOAF overturned Specified Officers’ admissibility decisions (in whole or in part) in 27% of our admissibility reviews, which is a slight deterioration on last year’s figure of 25%. However, this demonstrates that the Services continue to make the correct decisions on admissibility in the majority of cases.

The current Service Complaints system requires complainants to have completed the entire process before being able to approach SCOAF for an investigation into the merits (substance) or handling (maladministration) of their complaint – regardless of how long this process takes. This is not in keeping with other Ombudsman organisations, which afford the automatic right of escalation after a set period. This situation may prevent or discourage Service personnel from approaching the Ombudsman, particularly considering that the average time taken for a Service Complaint to reach a final AB decision is 75 weeks.

Furthermore, this year the Ministry of Defence was successful in passing legislation to amend the Armed Forces Act, which will allow changes to be made to the circumstances in which appeals can be accepted. The Ombudsman has expressed her concerns around these changes, and the potential for negative public perception. The Ombudsman will view with interest the further work to be completed by the Service Complaints Transformation team in setting out how these changes will be put into practice and how accessibility to the system will be maintained.

The Ombudsman also considers that some of the language involved in the Service Complaints system is overly complex and may discourage individuals from raising a complaint. The introduction of the Easy Read Guide this year is welcomed – however the Ombudsman notes that the value of this is limited if, as set out earlier in this report, individuals are still not receiving support from AOs or having initial interviews.

“ It was difficult to originally submit the complaint, I kept being told that it wasn’t a complaint ... it was very difficult to put forward and has seemed like they are trying to overlook and dismiss it before even investigating it. ”

Does not disadvantage or discriminate

The Ombudsman’s experiences on visits this year, where individuals have likened raising a complaint to ‘career suicide’, is alarming. There were concerns which included being labelled as a troublemaker for complaining, and that word would get out amongst their peers that they had raised a complaint. This negative perception is supported by SCOAF’s Service Complaint Feedback Survey (of people contacting SCOAF) which recorded that 44% of surveyed complainants said their colleagues were ‘disappointed’ in them for being involved in a Service Complaint.

“ I was told by a senior officer that even if I “win” my SC (which I substantially have), that my career is over, as I have upset too many senior people, by telling the truth. ”

“ My Chain of Command and others of higher rank than me made me feel disloyal for daring to make a Service Complaint. ”

The purpose of redress to a Service Complaint is to put an individual back in the situation they should have been in, had a wrong not occurred. The excessive time taken to reach resolution means that for many people, appropriate redress is often delayed – as a result, they are actively being disadvantaged by the system. This can be exacerbated by the time taken for consolatory payments to be approved and issued by Her Majesty’s Treasury.

Furthermore, the Service Complaints process can be stressful and upsetting for all involved. The time taken to resolve complaints means that issues are often hanging over individuals for a prolonged period, and they are unable to get on with their lives. Of those responding to SCOAF’s Service Complaints Feedback Survey, 90% who had been a complainant and 78% who were respondents, found their health and well-being was affected by the Service Complaints process.

Achieves appropriate outcomes

Individuals using the Service Complaints system must have confidence that the right outcome will be reached. In 2021, 46% of complaints were partially or fully upheld by the DB. After accounting for appeals, this rises slightly to 50% of complaints being partially or fully upheld. This demonstrates that an AB decision can differ from the initial decision reached, offering an important opportunity for additional information to be considered and to ensure appropriate outcomes are reached.

In terms of achieving appropriate redress, the Ombudsman is encouraged by the Services continued use of SCOAF's guidance on financial redress, and the circumstances in which payments may be appropriate. However, 88% of those who responded to SCOAF's Service Complaints Feedback Survey (of people contacting SCOAF) whose complaint was upheld, said that the underlying problem was not solved. The Ombudsman considers this could be improved by better management of expectations at the outset as to what may be achieved by the Service Complaints process. The Ombudsman also encourages the Services to continue to consider how the root causes of complaints can be addressed, and to proactively identify organisational learning in their decision making in addition to considering individual redress.

“ *The whole process was adversarial with the service determined to absolve itself of blame rather than try to learn.* ”

SUMMARY – is the system fair?

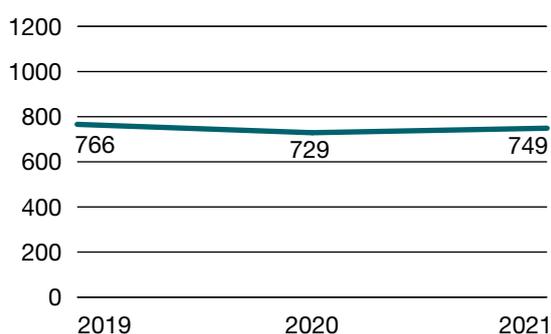
The Ombudsman acknowledges the efforts made to increase openness and transparency within the system and is broadly satisfied with the accessibility of the system. The Ombudsman is also encouraged by the consideration given by the Services to awarding appropriate redress.

However, ongoing issues around delay and a negative cultural perception of complaints mean that, whilst the system is performing better in this area than others, the Ombudsman cannot yet say that the system is entirely fair.

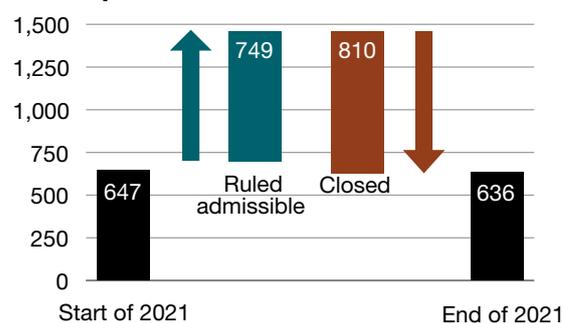
Chapter 2 – The work of the Service Complaints system 2021

Summary Statistical Charts

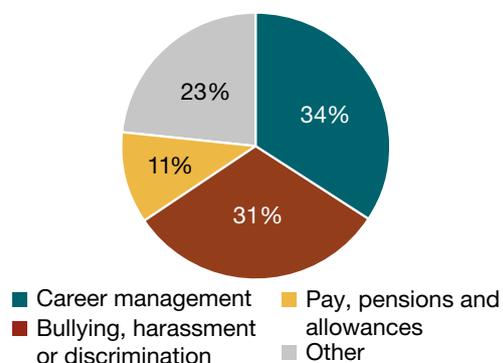
Number of Service Complaints ruled admissible, 2019–2021



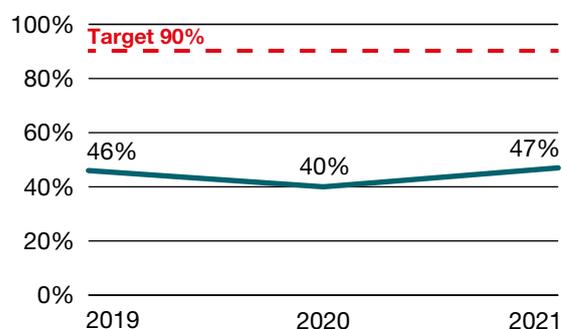
Number of Service Complaints: ruled admissible and closed in 2021; open at start and end of 2021



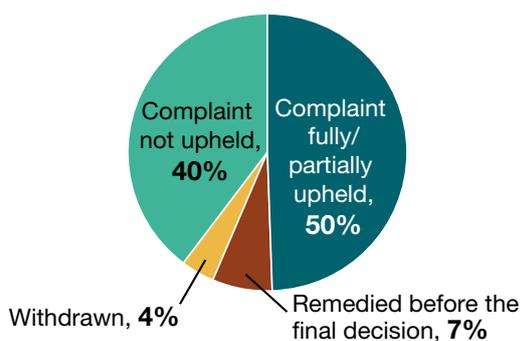
Category of Service Complaints ruled admissible in 2021



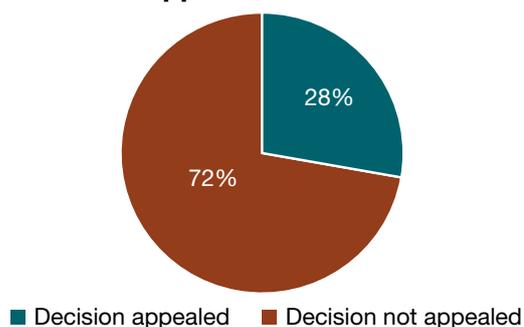
Service Complaint in-year timeliness rate*, 2019–2021



Outcomes of Service Complaints closed in 2021**



Proportion of Service Complaint Decision Body decisions appealed in 2021



* In-year timeliness rate is defined as the proportion of Service Complaints received in-year (i.e., 2021) which were closed in 2021 within the 24-week target.

** Percentage components may not sum up to 100% due to rounding.

Volume

In 2021, 749 Service Complaints were ruled admissible, which is a slight increase from last year.

The Services closed more Service Complaints in 2021 than they ruled admissible, which has led to an overall reduction in the number of open cases at year end.

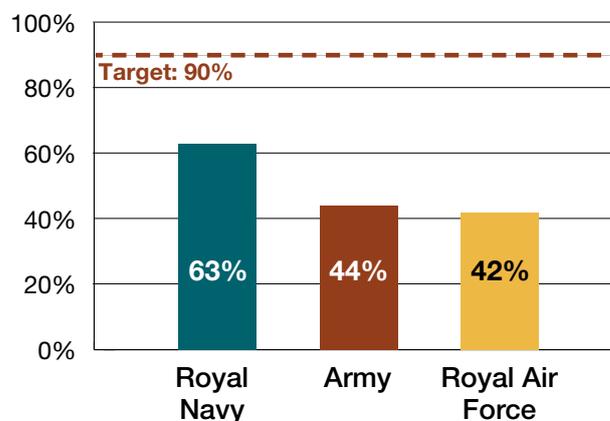
In total, the Service Secretariats worked on 2,033 complaints, consisting of 217 informal complaints, 370 applications to the Service Complaints process and 1,446 Service Complaints¹⁶.

Of all open Service Complaints at the end of 2021, 54% were considered ‘red flag’ cases, meaning that they have been open for more than 24 weeks. This is less than at the end of 2020, where 61% of open cases were red flags. Red flag Service Complaints continue to affect future timeliness in the process.

Timeliness

The current target is to resolve 90% of all Service Complaints in 24 weeks. In 2021, the tri-Service percentage of in-year Service Complaints closed within target was 47%. This is an improvement on last year’s figure of 40%. However, it is still somewhat short of the KPI.

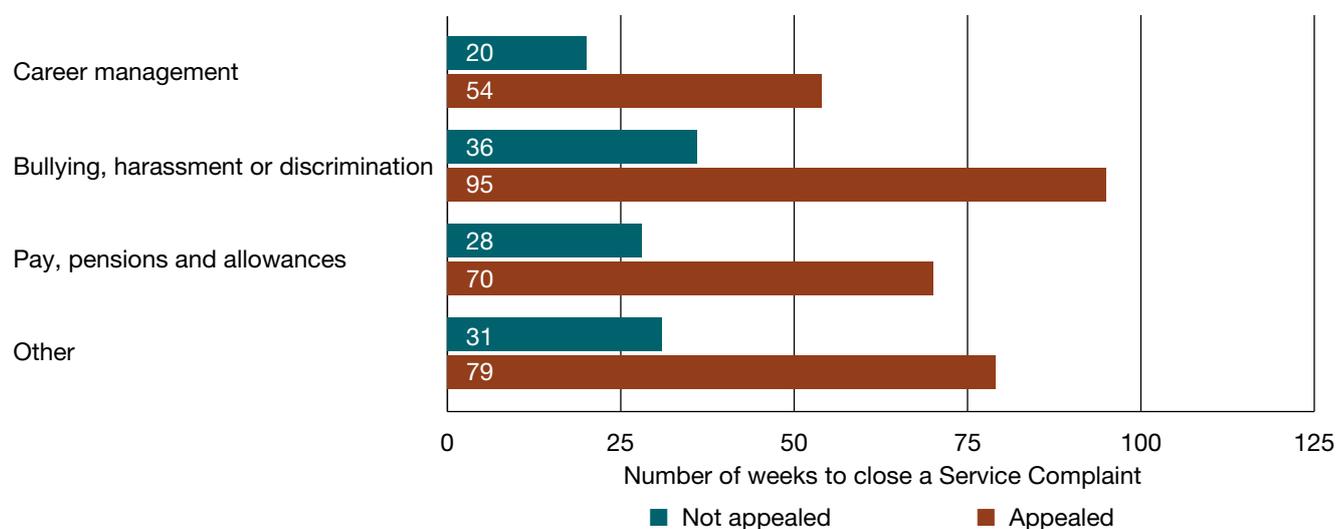
In-year timeliness rate by Service, 2021



The average time taken to close a Service Complaint was 36 weeks, which is a slight improvement on last year’s figure of 37 weeks. Where Service Complaints were not appealed, they took an average of 25 weeks to close and where they were appealed, they took 75 weeks.

¹⁶ To avoid double counting, the figure of 217 informal complaints excludes informal complaints that became applications to the Service Complaints process. Similarly, to avoid double counting, the figure of 370 applications to the Service Complaints process excludes applications that became Service Complaints.

Time taken (weeks) to close a Service Complaint by appeals status and complaint category, 2021



Outcome

In terms of outcome, half of Service Complaints were upheld or partially upheld in favour of the complainant.

Within the Service Complaints system, there is an appeal process and slightly more than a quarter (28%) of DB determinations were appealed in 2021.

Users of the Service Complaints system and the complaints they raise

The three main categories of Service Complaints made were: career management (34% of Service Complaints); bullying, harassment or discrimination (31% of Service Complaints); and pay, pensions and allowances (11% of Service Complaints). The average time taken to process a complaint varies by complaint category and whether the DB determination on a complaint is appealed.

Complaints are received from Service personnel of all ranks from all three Services. In general, female Service personnel are 2.4 times more likely to put in a Service Complaint than male Service personnel.

Further details about who makes Service Complaints, how Service Complaints progress through the system, what factors impact on how long a complaint takes and how people found the experience of being involved with the Service Complaints process can be found in SCOAF's [2021 Statistical Review of the Service Complaints System](#)¹⁷.

Single Service performance

While the annual assessment of the Service Complaints system is based on tri-Service performance, the Ombudsman appreciates that each Service has individual challenges and achievements. For this reason, the Ombudsman also provides a brief update on the work of each of the single Services in 2021. Alongside a statistical return, the Principal Personnel Officers (PPO) for each Service provide the Ombudsman with a written narrative. With the consent of the PPOs, each of these narratives has been reproduced in full at Appendix F.

¹⁷ This is available on our website

Royal Navy¹⁸



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Key Performance Indicator – 63% Timeliness Rate (Target: 90%)

In 2021, the Royal Navy (including the Royal Marines) ruled 149 complaints admissible as Service Complaints, which remains broadly on par with 2020. However, this year saw a sharp rise in the number of Service Complaints closed – 170 in 2021, compared to 119 in 2020. This led to a 13% reduction in the number of cases open at the end of the year compared to the start, and a 24% reduction in outstanding red flag cases. Furthermore, as the PPO narrative notes: “All SCs pre-dating 2017 have been resolved and only one pre-dating 2018 remains”.

The in-year timeliness rate of 63% represents a marked improvement on last year, and a return towards the Royal Navy’s historic performance levels. The average resolution time is 42 weeks, which is an improvement from taking 49 weeks to resolve Service Complaints in 2020.

The Royal Navy in its narrative attributes this year’s improved performance to:

- increased resources of both caseworkers and decision makers (last year, vacancies/gapped posts were highlighted as a significant issue);
- an initiative which saw a number of Service Complaints resolved directly by the Admiralty Board;

¹⁸ Royal Marine Service Complaints are included in the figures for Royal Navy Service Complaints as both are dealt with by the same Secretariat.

- the Royal Navy transformation programme, which saw significant changes to the structure and management of the Service Complaint Secretariat; and
- “*targeted investment ... [which] started to deliver an increased rate of SC resolution*”.

The Ombudsman is pleased with the significant improvements made by the Royal Navy this year and commends these efforts, noting in particular that this is the first time the Royal Navy has resolved more Service Complaints than it accepted in-year. Further progress against the transformation programme will be followed with interest. The Royal Navy’s comments around the “*requirement for reform of the [Ministry of Defence] KPI*” and the manner in which this is calculated are noted. The Ombudsman remains committed to contributing to these discussions and will be keen to continue engaging with the Royal Navy on ways in which undue delays in the system can be reduced.

Army



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Key Performance Indicator – 44% Timeliness Rate (Target: 90%)

In 2021, the Army saw a 15% decrease in the number of Service Complaints ruled admissible compared to 2020, most notably with a 28% fall in career management Service Complaints and a 41% fall in pay, pensions and allowances Service Complaints.

This combined with a slight rise in the amount of Service Complaints closed this year meant the Army closed nearly 100 more Service Complaints than it ruled admissible. This included closing the last of the legacy (i.e., pre-2016) complaints. The overall result was 24% fewer cases open at the end of the year compared to the start, and 38% fewer red flag cases outstanding.

The in-year timeliness rate of 44% was the Army's best performance in six years, and the time the Army took to close a case dropped both for cases appealed and not appealed. The Ombudsman is pleased with the continued improvement but notes that this remains a long way off the timeliness rate target of 90%.

The Army explains in its narrative that it had: "*Allocated an additional £1.1M per year to support the investigation of bullying harassment and discrimination cases by the new Outsourced Investigation Service (OIS)*"; and "*extra staff to support the in-house Fast-Track Decision Bodies*".

The Ombudsman will be keen to follow progress on the OIS, and the plans to ensure the financial sustainability of this initiative. The Army's narrative also included comments around the need to develop smart KPIs. The Ombudsman notes those comments and is supportive of the need for greater focus and drive in delivering Service Complaints reform.

The Army's narrative also discusses the Service's ongoing and additional focus on culture and behaviour (including with regards to minorities). It explains the steps taken to address culture within the Service, particularly around the lived experience of female and BAME personnel. The Ombudsman will follow the impact of this work and any resultant improvements to the handling of Service Complaints with great interest.

Royal Air Force



UK MOD Crown copyright 2021

Key Performance Indicator – 42% Timeliness Rate (Target: 90%)

In 2021, the RAF saw a significant increase (52%) in the number of Service Complaints ruled admissible, with the number of bullying, harassment or discrimination Service Complaints nearly doubling. The PPO narrative attributes this to the fact that *“our people are showing a willingness to report concerns, indicating an increasing confidence in our system, particularly with regards to alleged bullying, harassment, and discrimination”*. The Ombudsman notes that the AFCAS figures do not show a marked rise in bullying, harassment or discrimination complaints, and would therefore agree that this increase may be related to the significant focus placed on the importance and accessibility of the Service Complaints system by the RAF.

The RAF closed 25% more Service Complaints in 2021 than in 2020, which is to be commended. However, when balanced against the increased number of complaints received, the RAF closed 59 fewer complaints than it ruled admissible, resulting in an increase in the number of open complaints at year end. This was also the case in 2020, and steps must be taken to ensure that this does not become an established trend.

In terms of timeliness, the in-year timeliness rate was 42%, which represents the RAF’s poorest performance in six years and is a long way off the target of 90% timeliness rate. However, it should also be noted that the average time taken by the RAF to resolve a Service Complaint was the quickest of all three Services at 22 weeks for non-appealed decisions,

and 44 weeks for appealed decisions. This also represents an improvement on last year's average resolution times.

The RAF's narrative describes the significant focus placed on innovation and improvement in 2021, detailing:

- the launch of "*an electronic Service Complaints Submission Form*";
- a new Case Management system to enable "*better holding to account of stakeholders over 19 new internal KPIs designed to track stakeholder actions*"; and
- the piloting of the RAF Centralised Admissibility Team which brought the average time to make an admissibility decision down to seven working days.

The Ombudsman commends the efforts made by the RAF to trial new ideas, and to encourage Service personnel to raise complaints where appropriate. The Ombudsman will be keen to engage with the RAF to understand the full impacts of these initiatives and to follow future improvements. However, focus must be given to ensuring that the number of open Service Complaints does not continue to rise, and it must be noted that the system has to be equipped to keep up with demand.



Chapter 3 – The work of SCOAF in 2021

This chapter provides an outline of the work undertaken by SCOAF under each of the Ombudsman’s key legislative functions in 2021, and an overview of SCOAF including information on structure, outreach and legal engagement.

The role of SCOAF is to provide independent and impartial oversight of the Service Complaints system. This is primarily achieved through the execution of the Ombudsman’s four key powers.

- Help Service personnel access the Service Complaints system by making referrals for individuals who do not want to approach their chain of command directly to make their complaint.
- Review admissibility decisions made by the Services to determine whether a decision to not accept a complaint or appeal, either in whole or in part, was correct.
- Investigate undue delay in the handling of a Service Complaint or Service Matter.¹⁹
- Investigate the substance (merits) and/or handling of a complaint (maladministration) once the internal Service Complaints process is complete.

SCOAF received 338 applications for investigation, of which 91% were eligible for investigation and 65% were accepted for investigation.

Our Performance

Contacts

SCOAF logged 1,056 new enquiries in 2021. This is an increase of 23% compared to 862 enquiries in 2020.

Referrals

In 2021, SCOAF made 160 referrals. This is a decrease of 5% compared to 168 referrals in 2020. The largest number of referrals made was to the Army: 127 referrals (or 79%); followed by the Royal Navy: 22 referrals (or 14%); and the RAF: 11 referrals (or 7%). This is not in line with the proportion of Service strength with the Army accounting for 60% of Service strength, the Royal Navy accounting for 20% and the RAF accounting for 19%²⁰. 97% of referrals were made within seven working days which exceeds SCOAF’s target of 90%.

¹⁹ A Service Matter is any matter that has been raised with the Service and could potentially be a Service Complaint, but a Service Complaint has not been made. This could mean an individual could have made an informal complaint or submitted an Annex F/statement of complaint, but an admissibility decision has not been made yet.

²⁰ Figures do not add up to 100% owing to rounding. The proportion of Service strength each Service accounts for is the Army – 60.44% of Service strength, the Royal Navy accounting for 20.45% and the RAF accounting for 19.11%.

Investigations

In 2021, SCOAF received 338 applications asking the Ombudsman to use her powers of investigation, which is a 19% rise compared with 284 applications in 2020.

Of these 338 applications, 306 (91%) were ruled eligible for investigation and 220 (65%) were accepted for investigation. It should be noted that the Ombudsman is not an extra level of appeal and not all eligible applications are accepted for investigation. All eligible applications received for substance and maladministration cases are triaged. This is an initial case review which is carried out to determine if the matter warrants further investigation by SCOAF. In 2021, SCOAF declined to investigate 86 cases at the triage stage²¹.

Number of investigation applications received by SCOAF by application status and case type, 2021

Application status	Admissibility decisions	Undue delay	Substance	Maladministration
Applications received	108	83	83	64
Accepted for investigation	94	68	30	28
Not accepted for investigation	13	10	53	36
Pending acceptance decision	1	2	0	0
Withdrawn pre-decision	0	3	0	0

In 2021, 83% of investigations were completed within the time target; this is an improvement of 4% from a figure of 79% for 2020. This represents the best in-year performance since 2016. However, it still falls short of the KPI of completing 90% of investigations on target. Performance in the early part of 2021 was impacted slightly by the delay in appointing the Ombudsman, which resulted in some cases missing the timeliness target.

Review of admissibility decisions (ADM)

In 2021, SCOAF received 108 applications requesting a review of an admissibility decision. 27% of completed reviews found in favour of the complainant, either in whole or part. This is a slight rise in the upheld rate compared to 25% in 2020.

91% of admissibility reviews were completed within 17 working days. This exceeds SCOAF's performance target of 90% of admissibility reviews to be completed within the 17-working day KPI target.

²¹ There were 89 substance and/or maladministration cases not accepted for investigation of which three were ruled ineligible and 86 were declined at triage.

Undue delay (DEL)

In 2021, SCOAF received 83 applications requesting an investigation into alleged undue delay, with 68 (82%) of applications eligible for investigation.

SCOAF found undue delay in the handling of the Service Complaint or Service Matter in 57% of investigations completed, compared to last year's figure of 63%.

80% of undue delay investigations were completed within 17 working days, which is a decrease from 97% in 2020. This is below SCOAF's KPI target of completing 90% of undue delay investigations within 17 working days.

Substance (SUB)

In 2021, SCOAF received 83 applications requesting an investigation into the substance (merits) of a Service Complaint.

Of the 30 investigations completed, 50% of these found in favour of the complainant, either in whole or part, which was very similar to last year's figure of 48%.

77% of substance investigations were completed within 100 working days, which is a significant improvement on last year's figure of 47%.

Maladministration (MAL)

In 2021, SCOAF received 64 applications requesting an investigation into maladministration in the handling of a Service Complaint.

Of the 28 investigations completed, 71% found that there was maladministration, compared with 76% in 2020.

75% of maladministration investigations were completed within 100 working days, which is a significant improvement on last year's figure of 45%.

Backlog

Efforts to further reduce the backlog have been affected by an increase in the number of SUB and/or MAL applications received, continuing staffing difficulties posed by COVID-19 in 2021 and gapping of operational posts. As a result, SCOAF had 22 unallocated substance and/or maladministration investigations pending allocation to an investigator at the end of 2021, compared with 23 last year.

Whilst the reduction in the number of cases in the backlog does not appear significant, as of 31 December 2021, it was taking four and a half months to allocate a new case to an investigator. This is compared with nine months on 31 December 2020, and therefore represents a significant improvement in the service level provided by SCOAF.

As an independent and impartial office that provides oversight of the Service Complaints system, it is important to be transparent about our own delays and what is being done to address the issue. The Ombudsman recognises that the backlog is not acceptable as the time taken to allocate cases to an investigator remains too high and may initially create a negative perception of our overall service. However, this should not discourage complainants from approaching the Ombudsman as our top priority is working towards rectifying this issue.

The Investigation Team remains committed to processing cases as efficiently as possible, while ensuring that they continue to deliver quality investigations and outcomes. Monthly updates on our current delays are available on our website. Complainants are provided with regular updates, which include information such as a revised timetable for the allocation of the case to an investigator, the reasons for the delay and timeframes for the completion of an investigation.

Recommendations and wider learning points

Following an investigation, the Ombudsman may make recommendations and/or wider learning points. In 2021, SCOAF made 115 recommendations and 141 wider learning points. The types of recommendations fell into four main categories:

- **Process – 61**
- **Apology – 35**
- **Policy – 6**
- **Consolatory awards – 13**

Since the Ombudsman was created on 1 January 2016, the types of recommendations made have remained broadly similar. SCOAF still sees the same basic errors: not providing updates; not following the JSP guidelines; or not engaging fully with the complainant to understand the detail of the complaint submitted. Although there have been improvements in decisions seen by SCOAF, the same issues were observed in investigations in 2021.

Judicial review

The decisions made by the Ombudsman in any investigation, including those made under delegated authority, are final. If an individual believes that the correct processes or legislation was not followed by the Ombudsman, they may apply for a judicial review.

In 2021, we received six pre-action letters under the judicial review process to challenge a decision issued by SCOAF. Three of these cases are ongoing.

Information on the costs incurred defending these actions can be found in our financial statement at Appendix C.

Staffing

SCOAF has funding for 25 members of staff, including the Ombudsman. In addition, SCOAF uses three Fee Earner Investigators on a case-by-case basis.

The Business Team consists of: the Ombudsman's Executive Assistant; Head of Office; Policy and Improvement Manager; Statistics Manager; Communications Officer; Business Manager and Administration Support. The Business Team is responsible for managing the Ombudsman's diary and external engagements, production of the annual report, finance, accommodation and IT.

The Operations Team consists of the following posts: Chief of Operations; Head of Investigations; eight Senior Investigators; three Investigators; one Investigation Support Officer; and three Enquiries and Referrals Officers. During the first eight months of 2021, the Operations Team was carrying three vacancies; two of which were filled by Senior Investigators who joined the team in August and September. At the end of December

2021, there were two open vacancies: one Referrals and Enquiries Officer and the Chief Operating Officer²² whose post became vacant in October 2021. However, two vacancies were being filled by internal staff on a temporary basis for a proportion of 2021. One of those vacancies has since been filled, with the other being converted to a Senior Investigator post, which was subsequently filled and meant the Operations Team gained three new Senior Investigators in 2021.

COVID-19

Staff continued to work remotely for the bulk of 2021. This was in line with Government guidelines and due to SCOAF undertaking a physical office move, which left SCOAF without direct access to an office for five months. Both the move and COVID impacted our operational capability for the first eight months of 2021, particularly the access to printers, phones and scanners which are key items in progressing hard copy applications. Following SCOAF's move into a new office and upgrading its IT system in September 2021, this has enabled staff greater access to the tools they need, and enhanced their working at home experience, with access to MS Teams.

There still appears to be a reliance on providing paper files across the Services, which created an additional challenge when working remotely. SCOAF will continue to work with the Services to identify and implement an improved method of sharing case files.

Business outputs

SCOAF designed and published three new strategic objectives covering a five-year period. Underpinning these objectives is the SCOAF business plan which is published on the SCOAF website and highlights SCOAF's in-year objectives.

These provide a clear direction for the next five years: how SCOAF will continue to improve internally; how SCOAF can work more collaboratively with the Ministry of Defence and Services to identify and implement improvements within the Service Complaints process; and how SCOAF can maximise our stakeholder engagement and outreach to help drive systemic change.

The three new strategic objectives are:

Strategic Objective 1: This focuses on how SCOAF could improve its internal process and delivery as well as have mechanisms in place to support the team as a whole. Some of the in-year priorities completed are:

- discussed and designed training plans.
- produced a guide for investigators to ensure consistency across all our decisions.
- created an accessible data library.

Strategic Objective 2: This focuses on how SCOAF could improve awareness of the Service Complaint process and how we make better use of shared learning. Some of the in-year priorities completed are:

- Launch of SCOAF's bespoke survey.
- Published the first shared learning piece with the Services on admissibility.

²² Formally called 'Chief of Operations'

- Continued outreach.
- Launched Vodcasts.

Strategic Objective 3: Driving systemic change is the objective with limited “quick wins”. Systemic change takes time to implement and see results. Work has begun on the 2022 Stakeholder Symposium which provides an opportunity for SCOAF’s stakeholders to attend a face-to-face conference and hear first-hand from the Ombudsman. The intention is to hold this in June 2022. Further to that all opportunities for engagement have been taken such as presenting at the International Conference of Ombuds-Institutions for the Armed Forces (ICOAF) and CODC/FCSPs. This is in addition to the outreach programme which includes visits to military establishments and Armed Forces charities.

A full list of all the in-year priorities and progress as at 31 December 2021 can be found at Appendix A.

Outreach and Education

Outreach is a key element of the Ombudsman’s role. While COVID has had some impact on the Ombudsman’s outreach programme this year, the Ombudsman has undertaken a number of visits. These consisted of familiarisation visits to the single Service Secretariats, before focussing on training establishments across all three Services. To aid understanding of what new recruits’ aspirations and expectations were on joining the Armed Forces, a questionnaire was devised and handed out. The intention is to re-visit with some of these recruits in five years to see if their views/expectations remain the same.

SCOAF launched its bespoke survey in June 2021, which is available via the SCOAF website and is open to anyone who is a current or former member of the Armed Forces. It provides SCOAF with an understanding of what the issues are with the Service Complaints process and how we can focus our shared learning with the Services to make continuous improvements. This has been a success story with 188 completed surveys received by 31 December 2021. The Ombudsman is pleased with the return rate and a significant portion of the information received has informed this annual report.



Chapter 4 – Recommendations

In 2016, the Service Complaints system was reformed and since this time the Ombudsman has made several recommendations for improvement. When making recommendations, the Ombudsman sets timeframes for substantial compliance based on the specific issue and length of time it would take the Ministry of Defence and the single Services to complete all aspects of the recommendation by.

Between 2016 and 2020, the Ombudsman made 35 recommendations and six observations, although no recommendations were made in 2020. As of 31 December 2021, eight recommendations remain ongoing and four are recorded as “rejected”.

To date, the Ombudsman is disappointed in the time the Ministry of Defence has taken to progress the recommendations in Annual Reports 2016 to 2019. Although progress has been made against some of these recommendations by the Ministry of Defence, the single Services and the Service Complaints Transformation team, the pace has been slower than the Ombudsman envisaged.

The Ombudsman has made four new recommendations for her 2021 Annual Report which are detailed in full below:

Recommendations

6.1	Process	Recommendation – The Ministry of Defence engages with SCOAF in order to amend JSP 831, particularly the Annex F: Service Complaint form to ensure a consistent approach in the recording of all grievances.
6.2	Process	Recommendation – The Services should submit a quarterly progress report to SCOAF setting out the age profile of open cases, and explaining what steps are being taken to reduce delays and progress older cases.
6.3	Process	Recommendation – That the Ministry of Defence reframe the Annex F form to be a single point of entry for all grievances which sit outside of the Special-to-Type process, allowing them to be streamed to the most appropriate method of resolution.
6.4	Communication and Training	Recommendation – The Ministry of Defence commits to substantively concluding all open and accepted recommendations made by the Ombudsman prior to Annual Report 2020, within 12 months of this report (Annual Report 2021). Quarterly meetings between the Ombudsman, Chief of Defence Staff and Chief of Defence People should take place in order to provide assurance to SCOAF on the level of progress being made, and so that issues preventing progress are clearly articulated, understood and mitigated.

Why has the Ombudsman made these decisions?

The purpose of the Ombudsman making recommendations is to seek to address systemic issues which are apparent following analysis of in-year data and the trends and issues arising in cases handled by SCOAF.

The Ombudsman is aware work is underway to reform the Service Complaints system and that policy changes will take time to embed before real improvements are made to the culture and performance around complaints. The Ombudsman believes that with the commitment and shared focus of the Ministry of Defence, the individual Services and SCOAF, this can be achieved.

The Ombudsman looks forward to reviewing these changes closely over the coming years. SCOAF will continue to report each year against the recommendations made in previous annual reports, until they have been completed.

Progress report against previous recommendations

Recommendations have been colour coded and grouped below:

Status

	Completed – Recommendation will no longer be reported against
	In progress – recommendation will be reported against until it is completed
	Work has not yet commenced on this recommendation
	The recommendation has been rejected by the Ministry of Defence or the single Services

Recommendation	AR Issue	SCOAF expected completion date	Update on progress ²³
1.5	AR 2016	31/06/2018	<p>The Ministry of Defence conducted reviews of both JSP 763 and JSP 831, which were released in Summer 2021. This recommendation will remain in progress to ensure that future editions of JSP 831 (noting that JSP 763 no longer relates to formal Service Complaints) are as accessible as possible, and that those who require assistance throughout the Service Complaint process, receive it.</p> <p>A Service Complaints Easy Read Guide, approved by the Plain English Campaign, was published by the Ministry of Defence in October 2021 to provide an accessible short summary of the process and what can be expected from it.</p>

²³ Provided by the Ministry of Defence

Recommendation	AR Issue	SCOAF expected completion date	Update on progress	
<p>1.8</p>	<p>That the Ministry of Defence develops a general training programme for all Assisting Officers and that a record of their completion of that training is held centrally to ensure that suitably qualified Assisting Officers can be identified with greater ease. This should be rolled out by the end of April 2018.</p>	<p>AR 2016</p>	<p>30/04/2018</p>	<p>The role of Assisting Officers (AO) was examined as part of the review of the Service Complaints system, and it was agreed that early access to an AO prior to the submission of a formal complaint be built into the process. A revised version of JSP 831, published on 29 June 2021, included this provision.</p> <p>Training for AOs will also be reviewed as part of the planned training needs analysis (TNA) for the whole Service Complaints system, which will be conducted when all changes and the structure of the revised system is finalised. When the TNA is completed, changes to the current training provided, and any new provision, will then follow.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
1.10	That the Ministry of Defence commissions a study by the end of April 2018 to determine the root causes of the overrepresentation of female and BAME personnel in the Service complaints system and that appropriate action is taken to try and redress this by the end of December 2018, including putting the appropriate support mechanisms in place.	AR 2016	31/12/2018	<p>An independent study into the overrepresentation of women and BAME personnel in the Service Complaints system was undertaken by the Ministry of Defence. The researchers conducted secondary analysis from the lived experience report data, and the finalised report was shared with the single Service Complaints Secretariats and SCOAF.</p> <p>The report included a number of recommendations for the Ministry of Defence to consider, along with findings from the secondary analysis – many of which have been taken into the Women in the Armed Forces Programme.</p> <p>Findings showed reduced confidence in the system across all cohorts, and the Chief of Defence People agreed that more work focussing on increased confidence was the priority ahead of implementation of the reformed Service Complaints system. Once the new system is embedded, we will monitor and review overrepresentation in the system.</p>

Recommendation	AR Issue	SCOAF expected completion date	Update on progress	
1.11	That the Ministry of Defence identifies an appropriate working group by the end of April 2017 to evaluate the current target for resolving 90% of Service complaints within 24 weeks to ensure that it is appropriate, including the method for calculating when the 24 weeks begins. A representative from the OSCO should be involved in this review.	AR 2016	30/04/2017	<p>It was agreed in 2021 by single Service Chiefs and the Executive Committee that there is a need to reduce the time taken to resolve complaints and move towards reflecting public sector best practice. The intention is to set a more ambitious KPI, but the initial focus will be to ensure that we hit the existing KPI of resolving 90% of cases within 24 weeks.</p> <p>It was also agreed that proposed tighter and modular KPIs should be run by the Services alongside the existing KPI and be assessed.</p> <p>The Service Complaints Transformation team has engaged with the Ombudsman regarding this issue, and we will take forward this work in 2022.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
2.3	That by December 2018, all guidance and training provided to Commanding Officers and Specified Officers is reviewed to ensure that it includes specific reference to the extended timeframes to make a Service complaint that concerns a matter that could be taken to an Employment Tribunal. This guidance should include examples of the types of complaints which may give rise to the extended timeframe.	AR 2017	31/12/2018	<p>Information about extended timeframes for Service Complaints which could go to an Employment Tribunal can be found in JSP 831, Part 1, Chapter 1, paragraphs 16 to 19. It sets out that the usual time limit of three months for making a Service Complaint is extended to six months (discrimination claims) and nine months (equal pay claims). This advice is reinforced in Part 2 of the JSP in the specific chapter for the Specified Officer (SO), and the single Service Secretariat teams are able to provide initial advice to any SO who is unsure whether a Service Complaint should be ruled admissible.</p> <p>The Ministry of Defence does not believe it is necessary to include such detail and depth on this subject in Commanding Officer (CO) or SO training. COs and SOs are provided with comprehensive advice on each complaint and that case specific advice is more likely to be effective than generic training.</p>

Recommendation	AR Issue	SCOAF expected completion date	Update on progress
<p>2.4 That by April 2019, training is available to personnel involved in making decisions as part of the Service complaints process, including Specified Officers, Decision Bodies and Appeal Bodies, on decision writing for complaints handlers. This could be discreet training or part of a wider package on Service complaints as referred to in Recommendation 2.7.</p>	<p>AR 2017</p>	<p>30/04/2019</p>	<p>See recommendation 2.7 regarding the Ministry of Defence’s approach to those recommendations made by the Ombudsman in her 2016 and 2017 Annual Reports that relate to the provision of training to personnel involved in the Service Complaints system. This includes the creation of a Service Complaints Working Group Training Committee.</p>
<p>2.5 That by December 2018, the Ministry of Defence develops guidelines on the handling of informal complaints that can be included as an Annex to JSP 831. This guidance must provide, as a minimum, information on when it is and is not appropriate to follow informal processes and the steps to be taken in recording the informal process. The guidelines must also state that a complainant cannot be forced or unduly pressured/ encouraged to agree to informal resolution.</p>	<p>AR 2017</p>	<p>31/12/2018</p>	<p>This recommendation is now considered to be closed owing to the release of the new JSP 831 in June 2021.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
2.7	That by April 2019, an online training module on the Service complaints process, including a module on how to handle Service complaints for personnel charged with that process, i.e., Commanding Officers, Specified Officers, Decision Bodies and Appeal Bodies is developed and implemented tri-Service.	AR 2017	30/04/2019	As a result of the number of recommendations made by the Ombudsman in her 2016 and 2017 Annual Reports that related to the provision of training to those personnel involved in the Service Complaints system, a Service Complaints Working Group Training Committee has been formed. The purpose and focus being to review training from a tri-Service perspective to ensure what is being provided is appropriate and that best practice is shared. The working group will also consider how training is delivered; identify if there are any gaps; and how it might be provided in the future. A database that captures the breadth and depth of all training provided by the Services, including the name of the course/training provided; the audience; the training provider; the method of training; and the frequency has been provided to SCOAF.

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
2.8	That by April 2019, the Ministry of Defence reviews the existing primary and secondary legislation and determines how amendments can be made to provide a mechanism for respondents to a Service complaint to ask the Ombudsman to investigate alleged undue delay in the handling of that complaint. This mechanism should be available to all respondents, regardless of whether they are currently serving.	AR 2017	30/04/2019	Following stakeholder engagement, including with the Ministry of Defence Legal Advisors and single Services, the Service Complaints Transformation team identified and gained agreement on a number of proposals aimed at speeding up and removing undue delay from the system, for both complainants and respondents. These changes, both legislative and policy, will be reflected in a revised version of JSP 831 which is expected to come into effect in June 2022, once secondary legislation has been passed.

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
3.6	That by the end of October 2019, the Ministry of Defence sets a suitable KPI for making admissibility decisions within the existing 2-week target. This KPI should be determined following further work to ascertain why this target is routinely missed. Performance against this target will be measured and reported to the Ombudsman annually.	AR 2018	31/10/2019	<p>Under the current system, the time taken to make an admissibility decision is not included in the existing 24-week KPI, but policy states this must take no longer than two weeks. Following the review of the Service Complaints system it was agreed the length of time it takes to make the admissibility decision will form part of the KPI. The creation of centralised admissibility teams within the Services is aimed at providing a consistency in approach and ultimately reducing delay (see recommendation 3.8).</p> <p>Work to develop a new case management system is also underway and is being piloted by the RAF. This will enable better data collection to monitor areas of the system such as this and to manage the performance of the system as a whole.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
3.7	That legislation and/or Service complaints policy is amended by the end of April 2020, to allow for the appointment of a Specified Officer with the availability and capacity to take a complaint forward in accordance with the timeframe set out in JSP 831.	AR 2018	30/04/2020	The review of the Service Complaints system agreed that admissibility decisions should be performed by centralised admissibility teams within each of the Services, and outside of the complainant’s direct chain of command. The aim being to reduce the number of hand offs that occur between the Commanding Officer and the single Service Secretariats, providing a consistency in approach and ultimately reducing delay (see also recommendation 3.8). This change to policy will be included in the revised version of JSP 831, which is expected to come into effect in June 2022, following the introduction of the relevant secondary legislation. The RAF is currently piloting the process to ensure lessons are learned early, ahead of full implementation across all three Services.

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
3.8	That by the end of April 2020, the single Services establish a pool of permanent Specified Officers and Decision Bodies with full-time responsibility for making admissibility decisions and deciding complaints where capacity issues prevent Commanding Officers from dealing with complaints expeditiously.	AR 2018	30/04/2020	<p>The roles of the Specified Officer and the Decision Body (DB), which are functions that are currently performed as part of the Service Complaints process, are areas we considered as part of our review of the Service Complaints system.</p> <p>As set out above, as a result of that review, it was agreed admissibility decisions should be performed by centralised admissibility teams within each of the Services. The aim being to reduce the number of hand offs and to provide a consistency in approach and ultimately to reduce delay.</p> <p>The review also agreed that certain complaint types (e.g., terms and conditions of Service/policy) should be decided by regular standing or specialist DBs. These DBs will be knowledgeable subject matter experts and more familiar with the process.</p> <p>These changes to policy will be included in the revised version of JSP 831, which is expected to come into effect in June 2022, following the introduction of the relevant secondary legislation.</p> <p>The RAF is currently piloting the process to ensure lessons are learned early, ahead of the necessary secondary legislation, which will lead to full implementation across all three Services.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
4.2	<p>That a comprehensive review of data collection is conducted as part of any reorganisation of the Service Complaints system in order to ensure that the correct data is being collected and reported against. This review must consider the following key issues:</p> <ul style="list-style-type: none"> a. What is the overarching objective of the Service Complaints system and what data is required to report against this? b. What do stakeholders want to know about the Service Complaints system and can this data be collected and reported on? c. How is qualitative analysis conducted in order to ensure comprehensive reporting and understanding of the issues? 	AR 2019	No date provided	<p>The Ministry of Defence considers this recommendation follows the theme of delay in the system which is highlighted in SCOAF's Annual Reports and the Ministry of Defence's 'Report on Inappropriate Behaviours.'</p> <p>The review of the Service Complaints system identified that further work was required to see whether a new technological solution was needed to better track Service Complaints, and to provide data and information to enable the Ministry of Defence to properly monitor the performance of the system.</p> <p>The RAF commenced the piloting of a new case management system in Summer 2021, aimed at providing greater transparency of timeframes at each part of the process, and to monitor the journey of complaints through the system. We will review the findings of the pilot in 2022, with a view to rolling it out across the other two Services.</p>

	Recommendation	AR Issue	SCOAF expected completion date	Update on progress
4.3	That by December 2020, a leaflet is developed to provide individuals involved in the Service Complaints system a comprehensive overview of where they can get wellbeing support. This leaflet must be provided to all complainants and respondents.	AR 2019	31/12/2020	<p>In January 2021, the draft leaflets were shared with the Ministry of Defence and SCOAF for review. Further amendments were made before advertising on the relevant SharePoint sites.</p> <p>SCOAF confirmed that this recommendation has been satisfactorily implemented and the recommendation has therefore been closed.</p>

Appendices

Appendix A – SCOAF Strategic Objectives²⁴

Strategic Objective	Business Plan Activity 2021/22	Target Date
<p>Improve organisational performance to ensure SCOAF operates in a way that is efficient, effective and fair</p> <p><i>SCOAF should be able to hold themselves to the same standards used in appraising the performance of the Services. By improving the way we operate, SCOAF will be able to provide a better experience for those accessing our service, to the Services, and to our own staff.</i></p>	Review of referrals and enquiries processes to ensure they are as efficient as possible	June 2021
	Introduction of casework audits to ensure staff are working in the same way	June 2021
	Review standardisation of decision letters to ensure consistency in processes	June 2021
	Produce a guide to iCasework (internal database) to ensure investigators are working in the same way	June 2021
	Review central library of SCOAF key documents to create one source of knowledge to improve consistency	May 2021
	Formalise feedback and learning loop (including judicial review) to share knowledge across team	July 2021
	Review of consolatory payments to ensure consistency in decision making	July 2021
	Reduce silo working to ensure investigators are getting consistent QA feedback and working in the same way across the whole team	October 2021
	Set up a programme of activity for the staff engagement group	June 2021
	Establish yearly training on Service life for all staff to give them a greater understanding of the Services to aid them in delivery of their roles	March 2022
	Standardised training package for investigators and enquiries team (internal and external training) so they all have the same high quality training	October 2021

²⁴ SCOAF Business Plan 2021/22: [Business plan – Service Complaints Ombudsman \(scoaf.org.uk\)](https://www.scoaf.org.uk)

Strategic Objective	Business Plan Activity 2021/22	Target Date
	Create development paths for all roles so staff are aware of opportunities	October 2021
	Create 'How To' guides for each role (to replace Handover notes) to improve resilience and contingency planning in absence of staff in key roles	June 2021
	IT procurement so staff have good IT and to facilitate better communication with staff when working remotely	September 2021
	Improve housekeeping, including reduction in use of paper, to reduce storage of paper documents, reduce costs and be more environmentally friendly	March 2022
	Aim to become a paperless office with support of the Services (Service files) to facilitate easier remote working and reduction in use of paper	January 2022
	Memorandum of understanding with the Ministry of Defence to give reassurance around our independence and governance	December 2021

Strategic Objective	Business Plan Activity 2021/22	Target Date
<p>Increase confidence in the Service Complaints system by sharing knowledge and insight, and driving awareness and visibility of the Ombudsman</p> <p><i>SCOAF must go further to share the trends, learning and insight in order that improvement to the Service Complaints system as a whole can be made, along with ensuring that Service personnel are aware of SCOAF and the services provided.</i></p>	<p>Focus Groups:</p> <ul style="list-style-type: none"> – Re-design Focus Group sessions to enable greater interaction between SCOAF and Service personnel – Trial proposed changes to ensure they are beneficial 	<p>March 2022</p> <p>June 2021</p>
	<p>Focus Groups Feedback:</p> <ul style="list-style-type: none"> – Design a questionnaire for completion following Focus Groups to ensure Service personnel find them beneficial and to improve collection of information on issues impacting Service personnel – Analyse data from Focus Groups to inform the Annual Report and presentations 	<p>May 2021</p> <p>December 2021</p>
	<p>Launch of bespoke survey to gather more information on the experiences of Service personnel and our service delivery</p>	<p>June 2021</p>
	<p>Production and launch of Vodcasts for all three Services to enable message from the Ombudsman to reach a wider audience across the Services</p>	<p>July 2021</p>
	<p>New print campaigns to increase awareness of the Ombudsman and her powers</p>	<p>July 2021</p>
	<p>Draft a schedule of blogs/vlogs to be published to help raise awareness around issues in Service Complaints</p>	<p>June 2021</p>
	<p>Introduce quarterly thematic to share with the Services to help improve their knowledge about complaint handling and customer service</p>	<p>September 2021</p>
	<p>Anonymised examples of good responses/language to share with the Services to highlight good work</p>	<p>January 2022</p>
	<p>Restart bi-annuals with Services and the Ministry of Defence to facilitate the sharing of information and best practice between the organisations</p>	<p>September 2021</p>
	<p>Development of an online form to increase the accessibility of SCOAF to complainants</p>	<p>January 2022</p>
	<p>Tender for a new website to ensure SCOAF has a continued online presence</p>	<p>October 2021</p>
	<p>Factsheets on processes sent to all complainants to ensure they receive clear explanations of processes</p>	<p>May 2021</p>

Strategic Objective	Business Plan Activity 2021/22	Target Date
Identify and drive forward systemic change through continued engagement with wider stakeholders <i>SCOAF must ensure it is correctly positioned to be able to drive systemic change through focused engagement. By ensuring our voice is heard in the right places, we will be in a better position to improve the system.</i>	Engage with CDP on plans/recommendations to ensure they are aware of issues and successes	September 2021
	Produce a schedule of engagement with charity groups and stakeholders to raise the profile of SCOAF	June 2021
	Build networks with the ICOAF community to share best practice	March 2022
	Scoping for a Stakeholder Symposium in 2022 with the aim of delivering a high-quality event to facilitate engagement with SCOAF's key stakeholders	October 2021

Key:**Complete****Ongoing****Delayed**

Appendix B – Ombudsman Association Service Standards Framework

The Ombudsman Association (OA) is the professional association for Ombuds-institutions and complaint handlers in the United Kingdom, Ireland and the overseas dependencies/territories. The purpose of the OA is to:

- Support and promote effective systems of complaint handling and redress
- Encourage, develop and protect the role of an ombudsman as the ‘best practice’ model for resolving complaints, in both the public and private sectors
- Provide an authoritative voice and promote best practice and policy for those involved in complaint handling and redress to ensure an effective service for the public
- Support open and transparent accountability and endorse principles of good complaint handling.²⁵

As part of this role, the OA developed the Ombudsman Association Service Standards Framework which came into effect in 2017. The framework sets out what is considered to be good practice in the provision of fair and efficient complaint handling services. SCOAF has adopted this framework as a full member of the OA and will report against it annually. This year’s assessment is detailed below.

25 Objectives of the Ombudsman Association: <http://www.ombudsmanassociation.org/association-objects.php>

OA Service Standard	Our performance
<p>Future Improvement work</p> <ul style="list-style-type: none"> – Members’ service should be free to complainants. – Members should ensure that their procedures are customer focused. – Members should work with complainants to understand their needs, in order for complainants to access their service easily. – Members should make reasonable efforts to support access to their services for any user, including working with representatives and others to support complainants through their service, and publish their procedures for doing this. – Members should listen to what complainants want from them and ensure they understand their complaint. If a complainant is complaining about an organisation or issue that the member cannot consider complaints about, where possible they should direct the complainant to the relevant Association member, or another organisation who may be able to help. 	<p>SCOAF is a free and impartial service open to current and former members of the UK Armed Forces.</p> <p>Surveys and Feedback</p> <p>SCOAF has implemented a new bespoke survey to understand how stakeholders (e.g., complainants, respondents etc.) found complaint services of the Armed Forces and what feedback they want to give us. This enables SCOAF to monitor all activities and improve services provided.</p> <p>We also collect feedback on how people interact with our services and how we can make changes to drive future improvements.</p> <p>Procedures for understanding and processing complainants’ needs</p> <p>Individuals continue to make enquiries by phone, email or post.</p> <p>Every person making an application to our office is asked about restrictions in contacting them and can specify when and how they would like to be contacted.</p> <p>Enquiries and Blogs</p> <p>The enquiries and referral process has been reviewed to ensure the system is working smoothly to enable people to access our service straight away.</p> <p>Enquiries relating to any issues outside of our jurisdiction, we signpost to the most appropriate organisation. We provide a link to the OA’s Ombudsman Finder on our website and regularly include this in our social media content and blogs.</p>

OA Service Standard	Our performance
<p>Communication</p> <ul style="list-style-type: none"> – Members should treat service users courteously, respectfully and with dignity. – Members should communicate with complainants through complainants' own chosen method where possible. – Members should explain their role to service users. – Members should let complainants know what they can and cannot do, and, if they are unable to help them explain why. – Members should clearly explain to service users their process for handling complaints about organisations and likely timescales. – Members should keep service users regularly informed of the progression of their case, and how long things are likely to take. – Members should tell service users who they can contact if they have any questions at different stages in the handling of the case, and how they can do so. – Members should be accurate in their communications with service users using plain and clear language. 	<p>SCOAF sets out what individuals can expect when accessing our services. This incorporates the values of respect and open communication.</p> <p>The principles set out in the customer charter are incorporated in all of our internal processes and procedures.</p> <p>Explaining our processes</p> <ul style="list-style-type: none"> ● An introductory step-by-step process was published on the website documenting how people can access our office. This also facilitates the release of internal process pamphlets and factsheets, which gives a better perspective of how we provide effective communication. ● Individuals are provided with contact details for the person responsible for their case throughout the process. Once the case is allocated, the investigator is responsible for providing information on the process, in addition to regular updates, throughout the life of the complaint. Prior to allocation, our Investigation Support Officer provides regular updates on the estimated wait time. The office continues to move towards plain language to ensure that our communication is as succinct and accurate as possible. ● The survey/website data provides a summary of areas where we tend to score highest on our feedback and service. 41% of users are satisfied with SCOAF services (i.e., referrals and investigations). We are actively offering better communication to the Services and continue to encourage shared learning. We have had several open communications through facilitating meetings and inviting complainants to explain things in a succinct way to enable clearer understanding and better results.

OA Service Standard	Our performance
<p>Professionalism</p> <ul style="list-style-type: none"> – Members should ensure that the staff who consider complaints have the relevant knowledge, training and skills to make decisions, or have access to suitable professional advice. – Members should deal with complaints in a timely manner, taking into account the complexity of the case. – Members should ensure that remedies are appropriate and take account of the impact any identified faults have had on the complainant. – Members should use the outcomes of complaints to promote wider learning and improvement of the service and the sector complained about. – Members should ensure their record keeping is accurate and that they hold data securely. – Members should ensure that when sharing of information is necessary, it is done appropriately. – Members should follow their published processes when dealing with complaints about their own service, and they should acknowledge and apologise for any mistakes they make. – Members should actively seek feedback about their service and use it to improve. 	<p>Staff knowledge and skills profile</p> <p>All operational staff are trained to the same standard when joining our office, regardless of previous experience or education.</p> <p>Timeliness handling of complaints</p> <p>We publish timelines for all aspects of our work:</p> <ul style="list-style-type: none"> ● 2 working days to respond to an enquiry ● 7 working days to make a referral ● 10 working days to allocate an application to an investigator for an eligibility assessment ● 17 working days to complete an admissibility review ● 17 working days to complete an investigation into undue delay ● 100 working days to complete substance (merits) and maladministration investigations <p>Where we are likely to exceed the published timeframe, the individual will be informed of the reasons why and the expected date of completion.</p> <p>We publish a comprehensive set of statistics on our website, which includes details on the backlog.</p> <p>SCOAF has increased shared learning within the team, which has led to the Ombudsman publishing the first of a series of shared learning pieces on specific elements of the Service Complaints process.</p> <p>Redress and recommendations</p> <p>The Ombudsman does not have the power to grant redress, only to make recommendations for redress and wider learning points that seek to bring about systemic change.</p>

OA Service Standard	Our performance
	<p>In making these recommendations, a number of factors are taken into consideration, including the circumstances of the complainant and the impact the wrong has had on them.</p> <p>Freedom of Information (FOI) and Subject Access Requests (SAR)</p> <p>We have clear policies on FOI and SAR on our website. In 2021, we processed 11 FOI applications and 10 SAR.</p> <p>Feedback</p> <p>User satisfaction surveys</p> <p>Feedback on satisfaction with the service we provide is routinely sought from everyone who makes an application to our office. Response rates are low. In 2021, only 16% of our customers completed a feedback survey. The same survey is sent to all complainants who submit an application, regardless of the point at which their application is closed. Those whose complaint is not accepted for investigation or who are otherwise unhappy with their experience with SCOAF are more likely to respond than those who are happy with the service they have received.</p> <p>The results are reviewed quarterly and used to make improvements in a range of business areas.</p> <p>In 2021, feedback was used to improve:</p> <ul style="list-style-type: none"> ● our internal processes ● information on the website ● the format of our application forms and supporting guidance. <p>In 2021, our feedback survey showed that: 41% of users are satisfied in the overall service provided by SCOAF; 9% of users are neutral about the overall service provided by SCOAF; and 50% of users are dissatisfied in the overall service provided by SCOAF.</p>

OA Service Standard	Our performance
	<p>Complaints about our services:</p> <p>We received 12 complaints about poor service. Feedback from complainants helps us to identify improvements in our services and processes.</p> <p>Information on how to make a complaint about the service received from the Ombudsman's office or a member of staff is published on our website.</p>
<p>Fairness</p> <ul style="list-style-type: none"> – Members should work with service users without discrimination or prejudice. – Members should make decisions on cases based on their independent and impartial evaluation of the relevant evidence. – The reasons for decisions should be documented and explained to relevant parties. – Members should publish information concerning any opportunities that may exist for service users to challenge their decisions. – Members should make clear to service users their approach to unacceptable behaviour. 	<p>SCOAF is independent and impartial. All service users are treated equally and with respect in accordance with our customer charter.</p> <p>Our decisions</p> <p>Thorough and independent investigations are undertaken and findings are supported by investigative reports.</p> <p>Appealing our decisions</p> <p>There is no mechanism to appeal a decision made by SCOAF. However, if an individual believes the correct process was not followed, they can seek a judicial review. Information on judicial review is made available on our website and included in all decision letters.</p> <p>Unacceptable behaviour</p> <p>Our customer charter includes information on our right to place restrictions on access to our service should an individual consistently fail to meet their responsibilities under the charter.</p>

OA Service Standard	Our performance
<p>Transparency</p> <ul style="list-style-type: none"> – Members should publish information about the most senior staff in charge of decisions on complaints within their organisation, including the rules under which members operate. – Members should have procedures in place to deal with any conflicts of interest around the handling of complaints. – Members should be transparent about their investigation with the relevant service users. – Members should publish the learning that can be drawn from the complaints they handle in order to drive service improvement across the sector. – Members should provide service users with information explaining the approach they take to handling complaints about their own service. – Members should explain to complainants the procedures in place about what action can be taken if remedies are not implemented by the organisation complained about. 	<p>Our senior staff</p> <p>Information about the Ombudsman is published on our website alongside information about the legislative framework the organisation operates within. The Senior Management Team are not made up of staff of Senior Civil Servant grades and therefore no personal information about the senior managers is made available on the website.</p> <p>Conflict of interest</p> <p>We have a clear conflict of interest policy that is revised on an annual basis.</p> <p>Transparency</p> <p>Investigators are transparent about their work as far as is allowed within the boundaries of privacy and national security. Preliminary reports are made available to complainants and other affected parties for substance (merits) and maladministration investigations. This allows for any errors or concerns to be addressed. Information on how to make a complaint about members of the Ombudsman’s team or our service is made available on our website and upon request.</p> <p>The Ombudsman publishes an Annual Report in which learning about the complaints that are handled is analysed and discussed and recommendations made to improve the complaints system.</p> <p>The Ombudsman does not have the power to compel the Armed Forces to provide redress; only to make non-binding recommendations.</p>

Appendix C – Financial statement

SCOAF is a fully independent organisation. However, as a government-funded organisation, its budget is derived from the Defence Budget. While wholly independent of the Ministry of Defence in its role, SCOAF is still required to abide by the financial rules, regulations and procedures laid down by both Her Majesty's Treasury and the Ministry of Defence in the commitment of its financial resources.

Financial expenditure by SCOAF 2021

Category	Spend (£)
Staff costs	£1,074,982
Accommodation and office running costs (including IT and office machinery)	£167,864
Training and professional membership fees	-£58 ²⁶
Independent legal advice	£47,661
Travel and subsistence	-£115 ²⁷
Fee Earning Investigation Officers	£67,637
Total	£1,357,971

²⁶ The minus figure is the result of a consolidation exercise to review financial year end accounts.

²⁷ The minus figure reflects a cancelled Conference and subsequent refund.

Appendix D – Events, visits and external appointments

The table below lists all the official events attended by the Ombudsman Mariette Hughes in 2021. This does not include meetings held with the Service chiefs and Principal Personnel Officers

Date	Event type		Location
March			
5 March	Seminar	Launch of the Organisation for Security and Co-operation in Europe (OSCE) Office for Democratic Institutions and Human Rights (ODIHR), Geneva Centre for Security Sector Governance (DCAF) Human Rights of Armed Forces Personnel: Compendium of Standards, Good Practices and Recommendations	Zoom
April			
27 April	Visit	Army Secretariat (ASCOT)	Andover, Hampshire
29 April	Seminar	Association of Chief Executives (ACE) Navigating the challenges of post Covid working	Zoom
May			
11 May	Seminar	ACE: Strategic Impact of Covid	Zoom
12 May	Conference	Ombudsman Association (OA) Legal Interests Meeting	MS Teams
18 May	Interview	Recording of new vodcasts	Main Building, Whitehall
25–28 May	Conference	International Ombudsman Institute 12th World Conference	Zoom
June			
1 June	Visit	Navy Secretariat	Whale Island, Portsmouth
1 June	Presentation	Navy Executive Committee	Navy HQ, Portsmouth
8 June	Visit	RAF Secretariat	High Wycombe

Date	Event type		Location
10 June	Presentation	Commanding Officers Designate Course (CODC) - Navy	HMS Collingwood
17 June	Visit	Royal Military Academy (Army Training College)	Sandhurst
24 June	Seminar	ACE: How leadership is evolving	Zoom
July			
13 July	Meeting	Chiefs of Staff Committee	Main Building, Whitehall
14 July	Visit	Army – Initial Training Group	Pirbright, Surrey
19 July	Presentation	RAF Future Commanders Study Period (FCSP)	Skype
22 July	Presentation	Air Force Main Board (AFB)	Northolt
29 July	Presentation	Executive Committee Army Board (ECAB)	Andover
August			
4 August	Visit	Commandant's Rehearsal Parade	Sandhurst
9 August	Event	RAF Service Complaints Event	High Wycombe
September			
10 September	Conference	OA Annual General Meeting/Senior Leaders Network	Zoom
14 September	Presentation	Army CODC	Sandhurst
15 September	Visit	Britannia Royal Naval College (Navy Training College)	Dartmouth, Devon
16 September	Presentation	RAF FCSP	Skype
16 September	Event	RAF Battle of Britain Dinner	Northolt
23 September	Visit	Commando Training Centre (Royal Marines)	Lympstone, Devon
24 September	Conference	RAF Cosford	Albrighton, Shropshire
30 September	Event	RAF Legal Branch Annual Dinner	Brecon Beacons, South Wales

Date	Event type		Location
October			
4 October	Training	Introduction to Mediation	MS Teams
13 October	Visit	RAF Cranwell (Training College)	Sleaford, Lincolnshire
18–22 October	Conference	ICOAF Conference	Zoom
21 October	Presentation	Navy CODC	MS Teams
21 October	Conference	ECAB (Atherton Report)	MS Teams
27 October	Event	Marine Corps Annual Dinner	City of London
29 October	Seminar	ACE: Experimentation and Excellence in Hybrid Working	Zoom
November			
4 November	Visit	HMS Raleigh (Navy Training College)	Torpoint, Cornwall
December			
1–2 December	Visit	Army Personnel Centre (APC)	Glasgow, Scotland
8 December	Conference	Appeal Body Conference	Andover
10 December	Seminar	OA – Briefing on the Ombudsman Sector	MS Teams

Appendix E – Single Service Statistical Factsheets

Royal Navy

Key findings – Timeliness

- 63% of cases received and closed in 2021 were decided within the 24-week KPI. The target was 90%.
- The average time taken to close a Service Complaint is 42 weeks. Bullying, harassment or discrimination Service Complaints take the longest – 61 weeks.
- As at 31 December 2021, there were 146 Service Complaints open, of which 59% were beyond the 24-week target and not suspended or stayed.

Key findings – Volume

- In 2021, the complaints secretariat ruled 149 Service Complaints admissible.
- This represented 87% of investigation applications received.
- 42% of Service Complaints closed in 2021 were decided as upheld.
- 27% of Decision Body decisions were appealed.

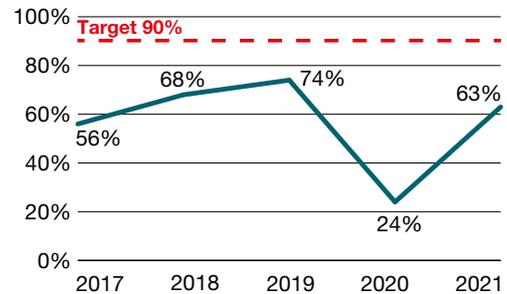
Key findings – Bullying, harassment or discrimination¹

- 11% of Royal Navy² personnel said they experienced bullying, harassment or discrimination.¹
- Of those Royal Navy personnel who said they had experienced bullying, harassment or discrimination, 12% said they raised a written complaint.¹
- 5% of Royal Marine personnel said they experienced bullying, harassment or discrimination.¹
- Of those Royal Marines, 13% said they raised a written complaint.¹

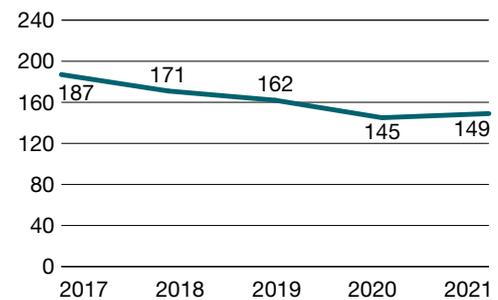
¹ Source: AFCAS 2021

² Excluding Royal Marines

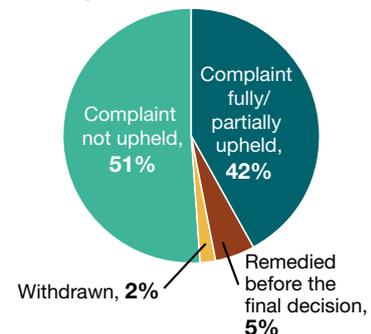
Service Complaint in-year timeliness rate, 2017–2021



Annual number of Service Complaints ruled admissible, 2017–2021

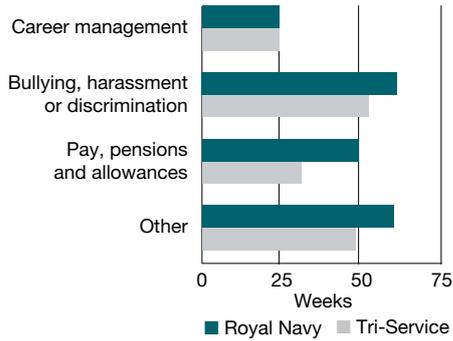


Outcomes of Service Complaints closed in 2021

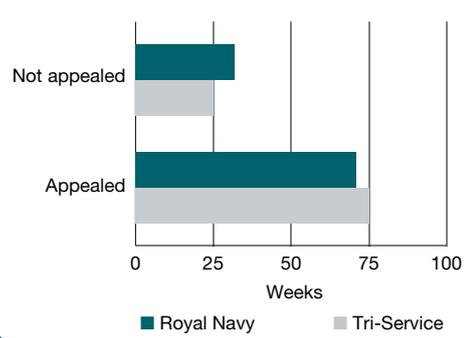


Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints withdrawn	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Royal Navy	37	13%	2%	42%	27%	42 weeks
Tri-Service	38	11%	4%	50%	28%	36 weeks

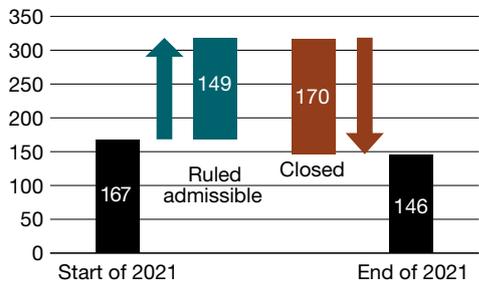
Time taken to close Service Complaints by complaint category, 2021



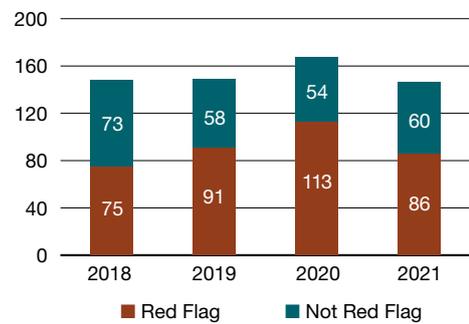
Time taken to close Service Complaints by appeal status, 2021



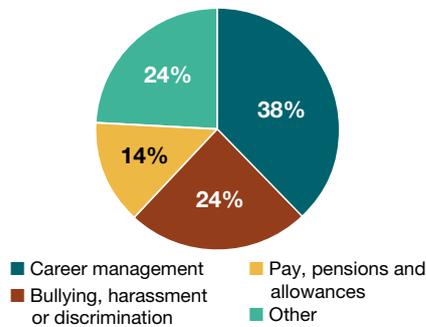
Number of Service Complaints: ruled admissible and closed in 2021; open at start and end of 2021



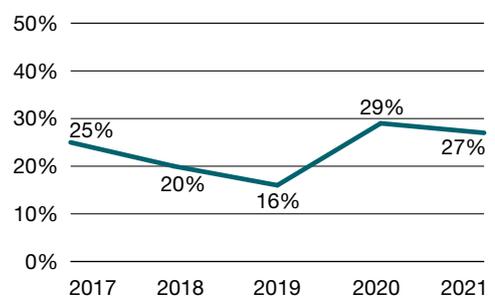
Number of open Service Complaints by red flag status, 2018–2021



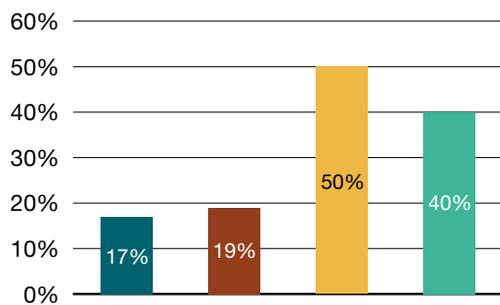
Category of Service Complaints ruled admissible in 2021



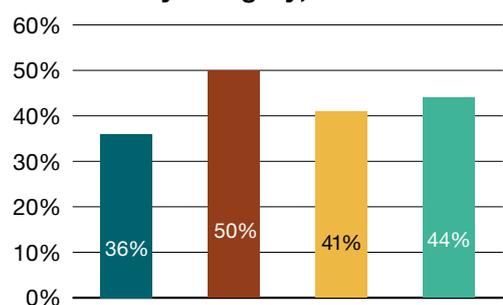
Service Complaints appeals rate, 2017–2021



Service Complaint appeals rate by category, 2021



Service Complaint upheld rate by category, 2021



Army

Key findings – Timeliness

- 44% of cases received and closed in 2021 were decided within the 24-week KPI. The target was 90%.
- The average time taken to close a Service Complaint is 40 weeks. “Other” Service Complaints take the longest – 55 weeks¹.
- As at 31 December 2021, there were 317 Service Complaints open, of which 53% were beyond the 24-week target and not suspended or stayed.

Key findings – Volume

- In 2021, the complaints secretariat ruled 367 Service Complaints admissible.
- This represented 89% of investigation applications received.
- 54% of Service Complaints closed in 2021 were decided as upheld.
- 28% of Decision Body decisions were appealed.

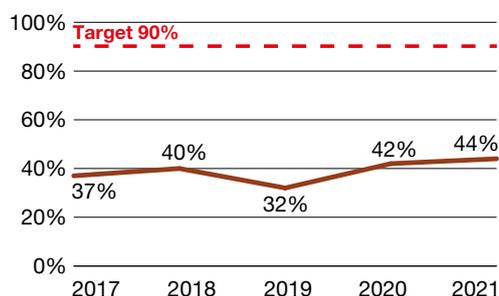
Key findings – Bullying, harassment or discrimination²

- 11% of Army personnel said they experienced bullying, harassment or discrimination.²
- Of those Army personnel who said they had experienced bullying, harassment or discrimination, 12% said they raised a written complaint.²

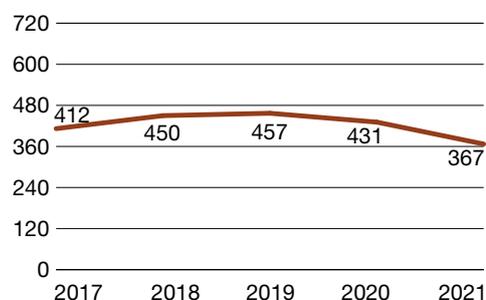
1 Can include time spent in the special-to-type complaints process for some accommodation and medical Service Complaints.

2 Source: AFCAS 2021

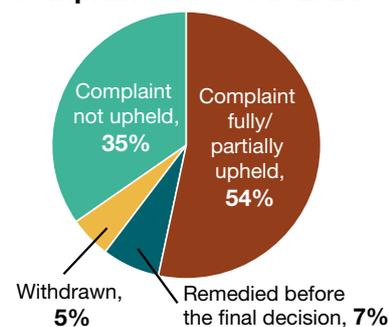
Service Complaint in-year timeliness rate, 2017–2021



Annual number of Service Complaints ruled admissible, 2017–2021

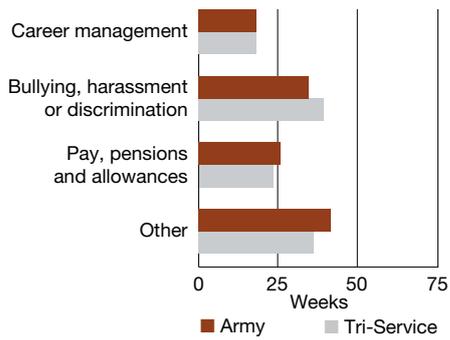


Outcomes of Service Complaints closed in 2021

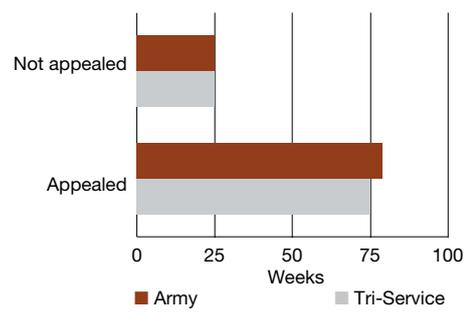


Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints withdrawn	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Army	31	11%	5%	54%	28%	40 weeks
Tri-Service	38	11%	4%	50%	28%	36 weeks

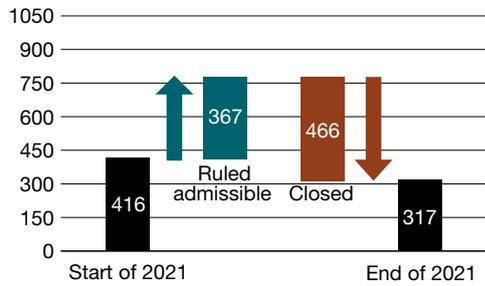
Time taken to close Service Complaints by complaint category, 2021



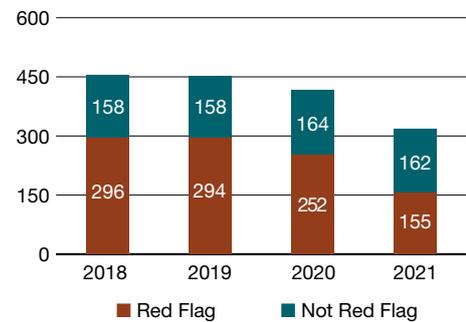
Time taken to close Service Complaints by appeal status, 2021



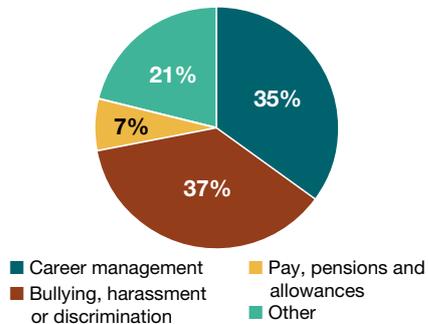
Number of Service Complaints: ruled admissible and closed in 2021; open at start and end of 2021



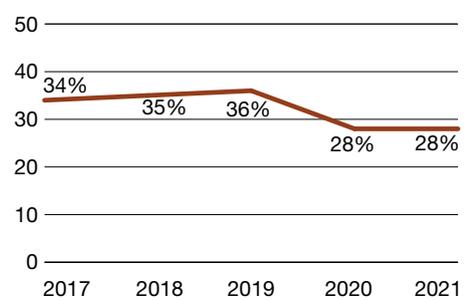
Number of open Service Complaints by red flag status, 2018–2021



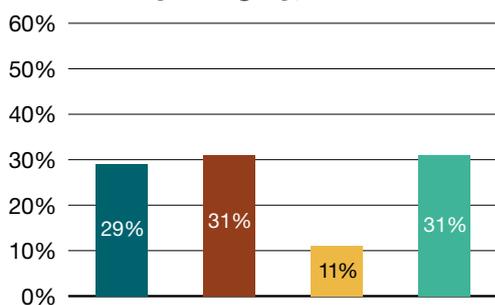
Category of Service Complaints ruled admissible in 2021



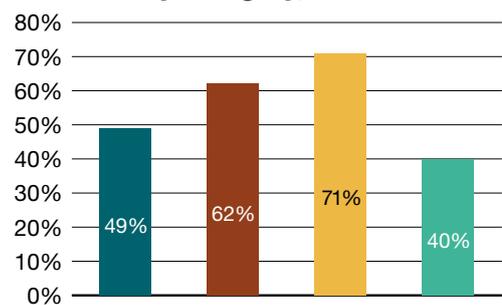
Service Complaints appeals rate, 2017–2021



Service Complaint appeals rate by category, 2021



Service Complaint upheld rate by category, 2021



Royal Air Force

Key findings – Timeliness

- 42% of cases received and closed in 2021 were decided within the 24-week KPI. The target was 90%.
- The average time taken to close a Service Complaint is 28 weeks. Bullying, harassment or discrimination Service Complaints take the longest – 59 weeks.
- As at 31 December 2021, there were 173 Service Complaints open, of which 51% were beyond the 24-week target and not suspended or stayed.

Key findings – Volume

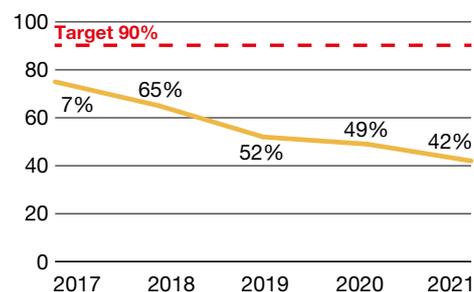
- In 2021, the complaints secretariat ruled 233 Service Complaints admissible.
- This represented 91% of investigation applications received.
- 47% of Service Complaints closed in 2021 were decided as upheld.
- 31% of Decision Body decisions were appealed.

Key findings – Bullying, harassment or discrimination¹

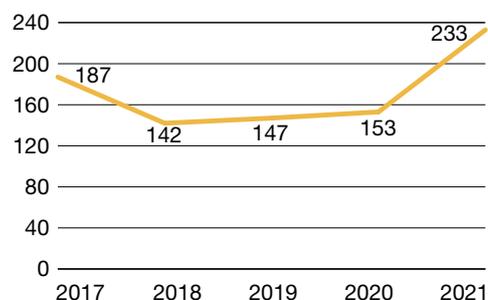
- 11% of RAF personnel said they had experienced bullying, harassment or discrimination.¹
- Of those RAF personnel who said they had experienced bullying, harassment or discrimination, 7% said they raised a written complaint.¹

¹ Source: AFCAS 2021

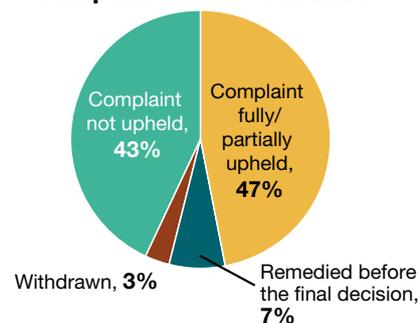
Service Complaint in-year timeliness rate, 2017–2021



Annual number of Service Complaints ruled admissible, 2017–2021

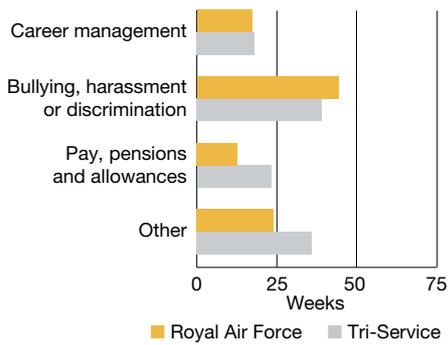


Outcomes of Service Complaints closed in 2021

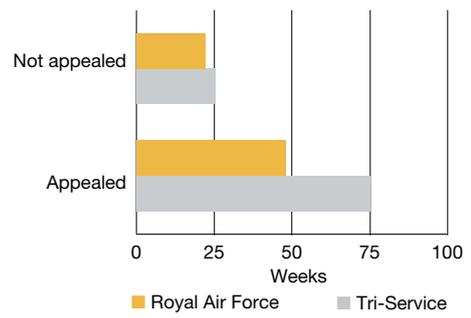


Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints withdrawn	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Royal Air Force	61	9%	3%	47%	31%	28 weeks
Tri-Service	38	11%	4%	50%	28%	36 weeks

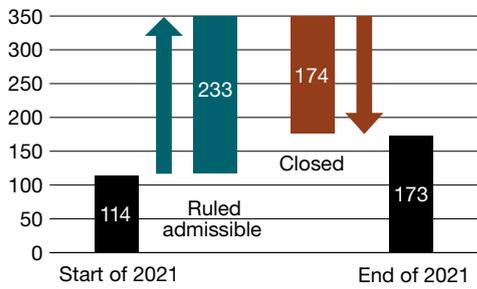
Time taken to close Service Complaints by complaint category, 2021



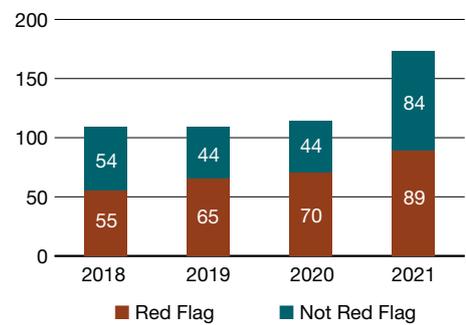
Time taken to close Service Complaints by appeal status, 2021



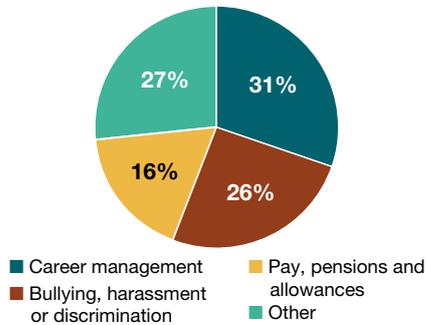
Number of Service Complaints: ruled admissible and closed in 2021; open at start and end of 2021



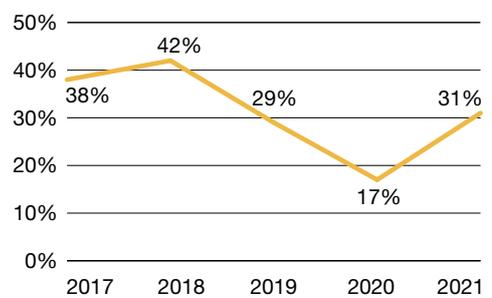
Number of open Service Complaints by red flag status, 2018–2021



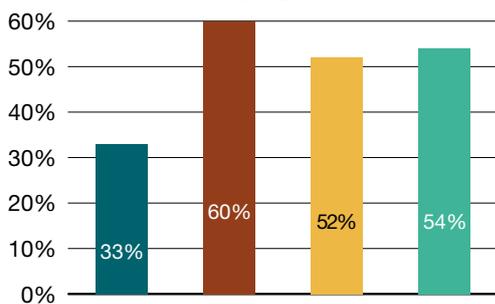
Category of Service Complaints ruled admissible in 2021



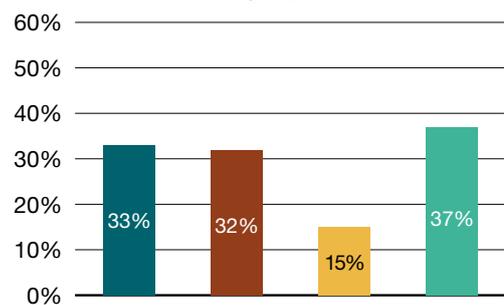
Service Complaints appeals rate, 2017–2021



Service Complaint upheld rate by category, 2021



Service Complaint appeals rate by category, 2021



Appendix F – Single Service Narratives

Royal Navy Narrative

OFFICIAL SENSITIVE

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ROYAL NAVY SERVICE COMPLAINT HANDLING IN 2021

1. Following the well-documented challenges of 2020 which had contributed to substantially reduced Service Complaint (SC) handling performance, the RN began 2021 with aspirations to deliver a significantly improved performance. Nevertheless, the year began with continuing challenges imposed by the enduring Coronavirus pandemic which required sustained adaptability, resilience and determination from all serving or working in support of the RN. These challenges have been mitigated by the good work done at the outset of the pandemic to develop ways of working remotely which have continued to deliver improved efficiency as pandemic restrictions have eased.
2. In this context, the RN's wide-reaching and ambitious transformation programme continued, and planned changes to the structure and management of the People and Training Directorate took effect. The SC Secretariat's structure and management was a significant part of these changes. Service Complaints was integrated into the People and Training Strategy area in a move which will facilitate organisational learning by allowing the lessons from SCs to be incorporated into the strategic work of the directorate in areas such as the Divisional and Regimental systems and personnel policy development.
3. As with any substantial change programme, the structural and management changes for the SC secretariat resulted in a degree of disruption characterised by manpower churn and logistical challenges. However, by the end of the summer, the long-term benefits of RN Transformation for SC management had begun to take effect. Targeted investment as part of RN Transformation started to deliver an increased rate of SC resolution from an organisation which is now ready to implement the changes legislated for as part of SC reform, the development of which the RN has continued to support.

What does the RN's investment in SC performance look like?

4. The RN has successfully grown its SC Casework Team by filling its established caseworker positions, taking steps to protect the incumbents of these positions from short-notice assignments, and generating and filling new permanent caseworker positions. In January 2021 the SC Casework Team comprised of 7 permanent Caseworkers (3 Military, 4 Civil Service), with 3 positions vacant or gapped. By December 2021 the SC Casework Team had grown to 12 permanent Caseworkers, with recruitment underway for 2 further positions. Similarly, 2 further decision-maker positions have been established increasing the RN's dedicated cadre of Decision Body and Appeal Body members from 6 to 8.
5. As well as increasing the workforce dedicated to SC management, the RN has sought to identify other ways in which to increase the efficiency and timeliness of SC resolutions. The Admiralty Board has sought to lead by example in this respect and has determined a total of 26 SCs itself. Of these cases 17 were resolved within 24 weeks of the admissibility decision and 9 were legacy matters which had been ongoing for a longer period of time.

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OFFICIAL SENSITIVE**What has the RN achieved in terms of SC performance in 2021?**

6. The RN's aspirations for 2021 SC performance were to substantially improve its assessment against the MoD KPI while also reducing the number of legacy 'Red Flag' SCs unresolved more than 24 weeks after the admissibility decision. Most importantly, the RN set out through the investment described above to increase the overall number of SC resolutions and reduce the overall number of open SCs in the system.

7. I am pleased to report that our SC handling performance against the 90%/24-week KPI has improved significantly from 24% in 2020 to 63% in 2021. I am pleased to note as well that our customary level and quality of timely service to your investigations team has remained consistent throughout 2021. The total number of RN SC resolutions has risen from 119 in 2020 to 170 in 2021, an increase of 43% which includes a 21% increase in the number of 'Red Flag' SCs resolved, from 87 in 2020 to 105 in 2021. The number of RN SC resolutions, including 'Red Flag' resolutions, is the highest it has been in 4 years marking the first year in that period the RN has resolved more SCs than have been admitted (please see the table below). This has achieved a reduction in the overall number of open SCs. The RN's intent is to continue this trend, further reducing the number and age of 'Red Flag' SCs whilst also improving performance against the MoD KPI.

Year	SCs Admitted	SCs Resolved	Red Flags Resolved
2021	149	170	105
2020	145	119	87
2019	162	157	68
2018	171	160	67

There has also been a focus on the very oldest 'Red Flag' SCs. All SCs pre-dating 2017 have been resolved and only one SC pre-dating 2018 remains.

The Need for KPI Reform

8. I echo my predecessor's submissions from last year that there remains a requirement for reform of the MoD KPI. Our KPI performance in 2021 is based on 56 SCs resolved within 24 weeks even though 65 were actually resolved within 24 weeks. The annualised format of the KPI means that there will always be SCs such as this which are never reflected in SC performance assessment by virtue of their admissibility dates. There were 61 SCs admitted in 2021 which, by virtue of their admission dates, will never reflect against the KPI. This represents 40% of SCs admitted in 2021.

9. In terms of satisfactory outcomes in first instance decisions, of 127 SCs which received a Decision Body decision in 2021, 93 (73%) were not appealed despite the almost unfettered access complainants currently have to an appeal process. The MoD KPI makes no measurement of the quality of outcomes, focussing purely on the timeliness of a subset of SCs in the system. As the RN has previously identified, the present KPI overlooks many other equally valid factors, including the overall caseload, but particularly any qualitative measurements evident in SC handling such as significant divergent findings arising from independent SCOAF substance and maladministration case findings as a proportion of all SCs reaching final determination by the Services in year.

10. The RN remains a strong advocate for KPI reform, and the introduction of new primary and secondary legislation to give effect to SC reform in early 2022 provides the perfect opportunity to identify a better measurement of performance. In order for the Services to work to awards and achieve efficient, effective and fair SC system, there must be an achievable and representative metric against which they can be held to account. It should be reflective of timeliness, quality of service and the substance of outcomes.

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The RN's interaction with the Service Complaints Ombudsman in 2021

11. I am grateful for your engagement this year and I am pleased that you have had the opportunity to meet with our sailors and marines during your visits to RN units. Our records show the following data sets and outcomes arising from the work conducted by your office on RN SCs in 2021:

- a. **SCOAF Admissibility Review.** The original admissibility decision by the RN was upheld by the SCOAF in 81% of cases (13 out of 16).
- b. **Undue Delay.** In 11 out of 32 applications (34%) undue delay was not found.
- c. **Maladministration and Substance.** Of the 12 applications received in year, to date only one had been found by the SCOAF to merit investigation. No action was taken on 7 applications following initial case review and the case review outcome is awaited in 4.
- d. **Maladministration.** Neither of the 2 applications submitted in 2021 were considered by the SCOAF to merit investigation.
- e. **Substance.** Only one application submitted in 2021 was considered to merit investigation by the SCOAF, the outcome of which is awaited, while 6 applications were not accepted.

Looking forward to 2022

12. The RN commences 2022 with a new SC secretary following Trefor Martin's retirement from the Civil Service. I am delighted to welcome James Gondelle as his replacement who joins the team with SC experience having worked for your predecessor early in her tenure. With the transformational changes and investment in SC performance I have outlined above almost complete, 2022 represents an exciting opportunity for the RN to increase SC output in the context of SC reform. With a larger, better-established and more experienced team, there is every reason to expect the RN will deliver further improvements to the benefit of our personnel. This will enable the RN to continue to reduce the age and number of legacy 'Red Flag' SCs while also improving the timeliness of resolution for new SCs.

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Annex:

- A. RN 2021 SC data.

Army Narrative

OFFICIAL

Lieutenant General Sir Christopher Tickell KBE
Deputy Chief of the General Staff

Army Headquarters
Marlborough Lines
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SP11 8HJ



Mrs Mariette Hughes
Service Complaints Ombudsman for the Armed Forces
PO Box 72252
LONDON
SW1P 9ZZ

26 January 2022

Dear Mariette,

SCOAF 2021 THE ARMY ANNUAL REPORT NARRATIVE

1. Despite the challenges of the COVID Pandemic the Army has consolidated upon its 2020 success and delivered further improvement in streamlining the Service Complaints (SC) process to improve efficiency and timeliness, the effectiveness of our decision making, and fairness. We continue to actively address all aspects of the lived experience of the Whole Force across all areas of Army life and in particular our behaviour and culture¹, specifically focusing on those areas highlighted in the HCDC report.² Much more still needs to be done, but we have put SC management at the heart of daily business. Our statistics show the progress to date:

- a. 44.3% of SCs were resolved within the Key Performance Indicator (KPI)³ of 24 weeks, compared to 42.4% in 2020 and 32.4% in 2019. Whilst this is still below the KPI of 90% the % is increasing yearly and there are areas of significant improvement particularly within the fast track system for Career Management (CM).
- b. The proportion of Army personnel (total 120,303) who submitted a formal admissible SC this year is 0.3%. This has decreased marginally compared to 0.4% in 2020. There has been an overall decline in admissible SCs this year of 15% (367 SC).
- c. The Army continues to make significant progress in reducing its red flag cases. At the end of 2021 there are 155 open SCs over 24 weeks, a reduction of 38.5% at the same time last year (252 SC). There are now no legacy cases open from the previous SC system.

2. The Army is committed to doing better and continues to invest in the SC system and drive cultural change. In the past year we have:

- a. Allocated an additional £1.1M per year⁴ to support the investigation of Bullying, Harassment and Discrimination cases by the new Outsourced Investigation Service (OIS).⁵ This will support SC Reform, build more trust in the system and further enhance our

¹ Chief of the General Staff (CGS) also spoke to the Army's senior leaders on the 8th December 2021 discussing the behaviour, culture and leadership that underpins our operational effectiveness and their vital role in setting this example.

² House of Commons Defence Committee: Women in the Armed Forces: From Recruitment to Civilian Life (parliament.uk), 12 July 2021.

³ See Annex A, tab 2.

⁴ Executive Committee of the Army Board (ECAB), 21 October 2021.

⁵ OIS went live on 1 October 2021 after a 2-month pilot.

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resolution of these cases. To date the OIS contract is proving to be better than its predecessor, both for quality and time, though it is significantly more expensive. A priority for ABC22 will be to agree with Defence an affordable financial plan to sustain the OIS contract.

- b. Adopted a holistic approach towards the 'lived experience' which included a CGS away day in December 2021 focusing on culture and behaviours.
 - c. Issued an Army Command Standing Order on Organisational Culture making clear what is included in Army Organisational Culture, and to establish a baseline for cultural improvement in behaviours.
 - d. Considered the lived experience of women in the Army at the 525th ECAB on 21st Oct 21st and implemented several measures that will lead to betterment.
 - e. Issued formal direction and guidance from the Military Secretary (MS) to the Army on reducing the root cause of MS related complaints.
 - f. And continued our internal reforms⁷ which include: preparation for new legislation; in-house admissibility; merit-based appeals; and extra staff to support the in-house Fast-Track Decision Bodies.
3. There are still challenges to be addressed:
- a. **Cohorts. Females** comprise 10.5% of the Army but have submitted 22.1% of admissible complaints (81 SC), however when excluding complaints relating to a protected characteristic and bullying (39 SC) this drops to 11.4%. **Black Asian and Minority Ethnic** personnel comprise 15.1% of the Army and have submitted 17.2% (63 SC) of admissible complaints. This is a significant reduction in the disproportionate % representation from last year.
 - b. **Defence SC Reform.** The pace has been slowed by the time it has taken to progress the Armed Forces Bill 2021 to enactment. Reform needs to be delivered now and must be supported by sustainable and realistic resourcing plans to ensure parity across Defence and the Civil Service.
 - c. **KPI Reform.** There is tension between efficiency and effectiveness and fairness. The pursuit of speed should not jeopardise the latter two. Cases can vary considerably in complexity hence the value of recognising this in smart KPIs. We want to be involved in the development of any emerging proposals. We also believe that exemptions⁸ should be adopted for matters out with the control of the parties involved in a case and we continue to press for the appeals process to be outside of the current 24-week KPI.⁹

Hope to catch up soon.

As ever

Chris

Annex:

A. Army Service Complaint Handling Statistics 2021.

⁷ Improving the Lived Experience of Women in the Army. ECAB/P(21)015. DPers.

⁸ SC Campaign Plan, dated July 2021 updated December 2021.

⁹ Exemptions include health reasons and operational deployments amongst others.

¹⁰ No appeal currently makes the KPI.

Royal Air Force Narrative

**From: Air Vice-Marshal M Byford QHDS MA BDS MFGDP(UK) FRAeS RAF
Chief of Staff Personnel and Air Secretary**



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Tel: 01494 495459

Mrs Mariette Hughes
Service Complaints Ombudsman for the Armed Forces

8 February 2022

SCOAF 2021 ANNUAL REPORT – RAF PERFORMANCE

Please find attached the RAF Service Complaints (SC) data for 2021. You will note that the RAF admissible SCs have increased significantly from 2020. I am encouraged that our people are showing a willingness to report concerns, indicating an increasing confidence in our system, particularly with regards to alleged bullying, harassment, and discrimination. As a result, we are taking an innovative approach to ensure that we address complaints and behaviours in a timely manner and to avoid confidence being undermined.

Over the last year we have taken decisive action to respond to the concerns raised in your previous report and to ensure that we could address the recent increase in admissible complaints. In August 2021 we held a Red Team Event which reviewed the end-to-end SC process and generated an Action Plan to improve the efficiency, effectiveness, and the overall experience.

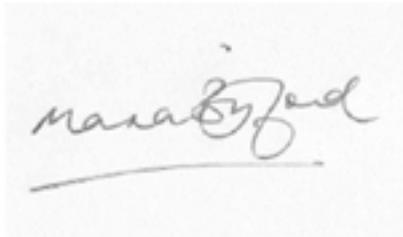
As a result, we finalised 42% of SCs with 24 weeks, with 85% of Fast Track complaints (pay and allowances, terms of service) closed within 24 weeks. Whilst this is marginally lower than last year, we have seen a 52% increase in admissible SCs, as our personnel show both a confidence to complain and belief in the RAF SC system, and we have responded by closing 25% more complaints this year. I am confident that what we are doing is working and with a little more time our Action Plan will enable us to improve and become more effective.

Key Action Plan Results

- The RAF SC Journey reduced the 170-page Air Publication to a single page called the *My SC Journey* and 10 trifold guides. *My SC Journey* is designed to increase access to and flexibility of the SC process, as well as to create a more efficient and effective system overall.

- The RAF SC Team have designed and fielded a Case Management system that captures more data enabling us to efficiently monitor outcomes and learning points, as well as enabling better holding to account of stakeholders over 19 new internal KPIs designed to track stakeholder actions. Whilst still in its infancy we are confident that this system will shorten the length of time that an average SC takes in 2022.
- The RAF Central Admissibility Team pilot launched on 1 Jul 21, with the aim of making admissibility decisions within 2 weeks of submission of an Annex F, using a standing panel and bespoke Specified Officers. The pilot concluded on 18 Oct 21, with an admissibility decision mean average of 7 calendar days over 63 SCs vs TS average of 60 days cited in your 2020 Annual Report. We are confident that our initiative has proven the concept, the impact will directly benefit our people, and we do not plan to return the decision to COs.
- The RAF believes that an open and honest culture is critical to the success of a Next Generation Air Force. To ensure that our system is accessible and transparent, we launched an electronic Service Complaint Submission Form (Annex F) on 1 Jan 22. Whilst we expect to see an increase in SCs as a result we believe a simple, seamless and transparent submission form is the right thing to do.

Finally, on behalf of the RAF I would like to thank you for the energy, passion, and support that you have provided to RAF SC over the last 12 months. We are truly grateful for the critical way that you challenge and guide us to create a more efficient, effective, and fair grievance process.



Annex:

A. RAF SCOAF Annual Statistics 2021.

Appendix G – Sources of further information

Further information on the Service Complaints process, in the form of publications and/or statistics, can be found at the following sites.

Service Complaints Ombudsman for the Armed Forces	<p>www.scoaf.org.uk</p> <p>The SCOAF website contains copies of all past annual reports and statistical briefings concerning the Service Complaints system in addition to publications and information concerning SCOAF processes.</p>
Ministry of Defence	<p>https://www.gov.uk/government/organisations/ministry-of-defence/</p> <p>This site provides information on the organisations within the defence system, reports and data, and guidance.</p>
Ministry of Defence Service Complaints information	<p>https://www.gov.uk/guidance/armed-forces-service-complaints-process</p> <p>The site provides information and guidance on the Service Complaints process.</p>

Details of Ministry of Defence Statistical and Research publications 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	http://www.royalnavy.mod.uk
Royal Marines	https://www.royalnavy.mod.uk/royalmarines
Army	https://www.army.mod.uk
Royal Air Force	http://www.raf.mod.uk

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Contact details for individuals wishing to make an application to the Ombudsman or to find out more about SCOAF are:

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