



Service
Complaints
Ombudsman
for the Armed Forces

Annual Report **2024**

Independence | Impartiality | Integrity



Annual Report **2024**

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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Foreword from the Ombudsman



Dear Secretary of State,

I am pleased to present the Annual Report for 2024, covering my fourth year in post as the Service Complaints Ombudsman for the Armed Forces.

There has been a significant amount of progress this year in delivering outstanding SCOAF recommendations, which is encouraging. This has been achieved through a considerable effort from the Services to play an active part in designing solutions and making changes, and an increased commitment by the Ministry of Defence to deliver improvements.

The Services have faced another year of increased volumes, with the total increase in admissible complaints over the last three years being 74%. I have always stated that I support an increase in the number of incoming complaints, as it is vital that all Service personnel who have need of the system feel confident in coming forward. However, the effect of this is that efforts to speed up the resolution of complaints in pursuit of the Key Performance Indicator (KPI) may be hampered by the volume of new, incoming complaints. This is reflected in the drop in performance against the KPI this year.

As you will be aware, this year marks the introduction of a new method of calculating the timeliness KPI for Service Complaints¹. This new approach reflects best practice in the complaints sector, and provides a more reliable measure of performance. However, given the need to be able to track changes and improvements year on year, the intention is to report both metrics for a number of years to enable more accurate analysis.

Once again, all three Services have engaged with each other and with my office in a positive and meaningful fashion this year, seeking to learn from each other and identify areas for improvement. I would like to put on record my thanks and appreciation for their openness and efforts.

I have made two new **recommendations** this year, and one **observation**. These focus on the need to support all parties to a Service Complaint, to improve the metrics for assessing the efficiency of the system, and to ensure issues which affect large numbers of personnel are dealt with effectively.

¹ [Appendix A](#). Please note: to enable meaningful comparison, all charts in this report display the old KPI unless stated otherwise.

I am pleased to report SCOAF once again succeeded in meeting our own KPI this year, with 99% of all cases closed within timeliness targets in-year. This is the third consecutive year that SCOAF has exceeded the KPI. In addition, the backlog of cases awaiting allocation has been completely eradicated, meaning that we are able to assist individuals as soon as they make contact with our office.

I welcome the plans for the introduction of an Armed Forces Commissioner in 2026, with an expanded remit which seeks to support and promote all aspects of welfare for Service personnel – including the operation of the Service Complaints system. This is a positive development which has the potential to deliver wide ranging benefits. However, it remains vital that sufficient focus is placed on working together to improve the Service Complaints system as the primary mechanism for resolving grievances for all Service personnel.



Mariette Hughes

Service Complaints Ombudsman for the Armed Forces



Message to my team

SCOAF has had another impressive year in 2024, with the entire team pulling together and delivering exceptional results. I am so thankful for the efforts of the entire organisation this year.

For the first time on record, SCOAF closed the year with no cases awaiting allocation. The fact that SCOAF has been able to eradicate the historic backlog represents an incredible milestone, and means we are able to provide a service of which we can rightly be proud. Along with this, the timeliness KPI was once again exceeded, with 99% of cases being resolved on target. This would not have been possible without the continued enthusiasm and efforts of every single member of the SCOAF team.

The Operations Team has once again demonstrated the pride they take in their work, coming together to improve the experience for our users, and taking ownership of new ways of working. The Business Team has again delivered to a high standard this year, despite a number of gapped positions. In addition to ensuring the smooth running of SCOAF as a whole, we have engaged with the proposal for the new Armed Forces Commissioner, delivered a successful Stakeholder Symposium, conducted an extensive outreach programme, and given oral evidence to the Public Bills Committee. Special thanks must also go to my Senior Leadership Team for their continued support, sound advice and professionalism.

I know that there is a level of uncertainty around the transition to the Armed Forces Commissioner in 2026, but I have every confidence that SCOAF will continue to deliver.

I am now four years into my tenure – and as I look back over everything that has been achieved, I can honestly say it would not have been possible without the amazing people I have the privilege of working with. SCOAF is a small, close-knit team, and I hope everyone understands how vital the role that they play is – not just in delivering, but in bringing joy, enthusiasm and positivity to the work we do.



Executive summary



About the Service Complaints Ombudsman for the Armed Forces

The Service Complaints Ombudsman for the Armed Forces' (SCOAF) Annual Report 2024 details the work undertaken by the Ombudsman's office in 2024, and reviews the work of the Services.

Our mission

SCOAF provides independent and impartial oversight of the Service Complaints system for all members of the UK Armed Forces.

Our vision

SCOAF's vision is that all Service personnel have access to, and confidence in, a Service Complaints system that is efficient, effective and fair.

Our customer charter



We will always treat you with respect and expect the same in return for our staff.

We will ensure that the information we provide is clear and easy to understand within the remit of the powers of the Ombudsman. We undertake all aspects of our work fairly and impartially as an independent body and never compromise confidentiality. We will continually look to improve the service we offer and listen to the feedback provided. The full version of SCOAF's customer charter can be found on our [website](#).

Our strategic objectives

- Improve organisational performance to ensure SCOAF operates in a way that is efficient, effective and fair.
- Increase confidence in the Service Complaints system by sharing knowledge and insight and driving awareness and visibility of the Ombudsman.
- Identify and drive forward systemic change through continued engagement with wider stakeholders.

Stakeholder engagement

In addition to regularly scheduled meetings, the Ombudsman conducted several stakeholder engagements and visits in 2024, in order to increase awareness of the system and her office. A full list is at [Appendix E](#).

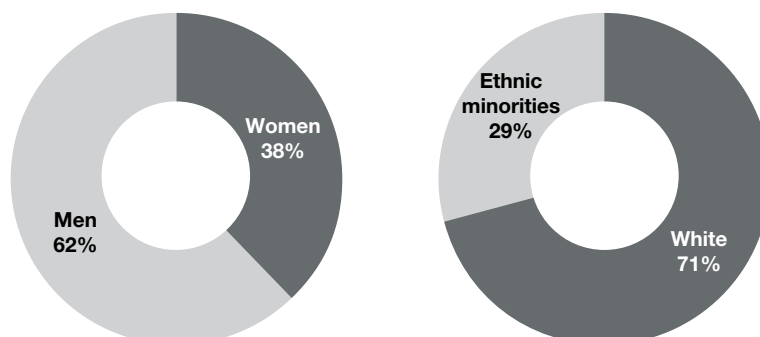


Our people

Every day, we work together independently of the Ministry of Defence to assure an effective Service Complaints system and create a culture to be proud of. Our employees are the foundation of our mission-driven culture.

We are committed to fostering an inclusive and diverse workplace. We aim to maximise the talent of our team by attracting, retaining and developing diverse skills, increasing representation at all levels, to build a workforce where differences are recognised and valued.

Our workforce



Service Complaints in 2024

The Service Complaints system is an internal workplace grievance system for members of the UK Armed Forces, both Regular and Reserves. The information below reflects the work of this internal process.

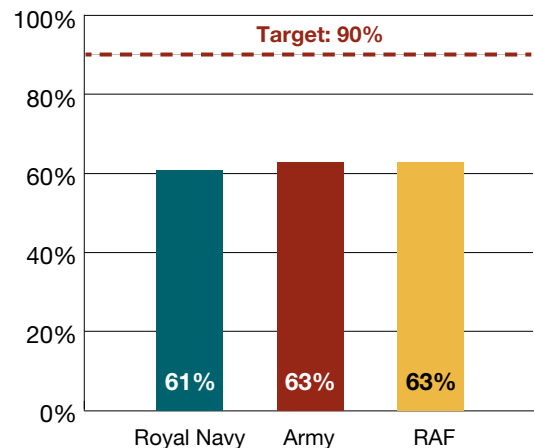
1,302 Service Complaints were ruled admissible in 2024

1 in 141 Service personnel raised a Service Complaint

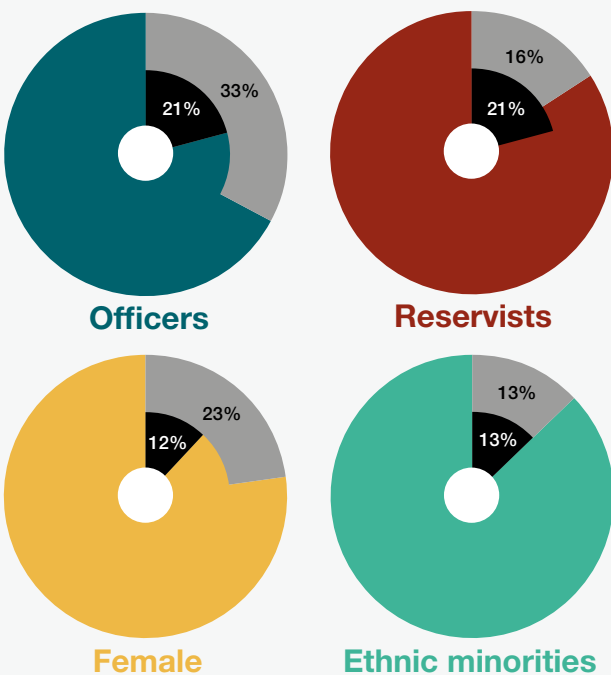
4 out of 5 applications resulted in a complaint being investigated

42% of Service Complaints are known to be upheld

Across the three Services, 63% of Service Complaints were closed within the 24-week target (new KPI)



Categories of Service Complaints



% of Service Complaints
 % of Service personnel

Officers overrepresented: **21%** of personnel, **33%** of admissible complaints.

Reservists underrepresented: **21%** of personnel, **16%** of admissible complaints.

Female Service personnel overrepresented: **12%** of personnel, **23%** of admissible complaints.

Ethnic minorities Service personnel proportionately represented: **13%** of personnel, **13%** of Service Complaints.

The work of SCOAF in 2024

SCOAF provides independent and impartial oversight of the Service Complaints system.



1,035
contacts
logged

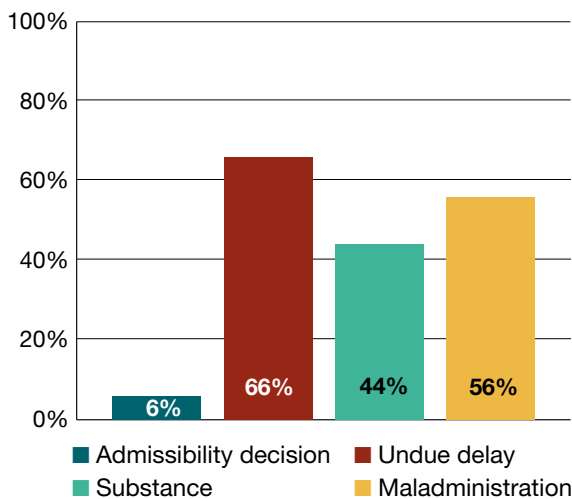
423 applications for investigation were received

94% of applications were eligible for investigation

69% of applications were accepted for investigation

99% of investigations were completed within the time target

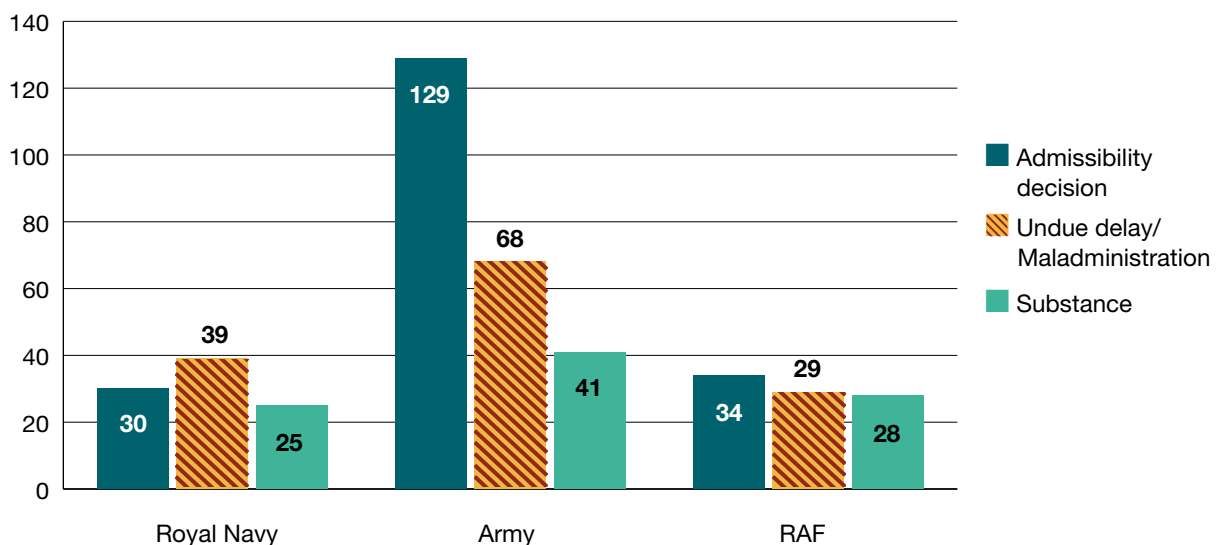
Percentage of investigations upheld in favour of the complainant by type



124 referrals were made

100% of referrals were made within the time target

Number of investigation applications received by type and Service²



² Owing to the RAF having fewer than five undue delay cases, Official Statistics advises that the precise number should not be released. Therefore, undue delay and maladministration have been combined when reporting the number of investigation applications received.



Chapter 1 – Efficient, effective and fair: the Ombudsman’s assessment



Chapter 1 – Efficient, effective and fair: the Ombudsman’s assessment

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

The system must show itself to be efficient in the handling and processing of complaints, eliminating backlogs and unnecessary delays. It must be effective, meaning that it achieves the purpose of resolving issues appropriately for Service personnel. And finally, the system must be fair, ensuring that the correct outcomes are reached, in a way that is open and transparent.

As was the case last year, whilst there have been some shifts in the assessments made, **the Ombudsman remains unable to say overall that the system is efficient, effective and fair.**




The system is very close to being considered fair. However, ongoing concerns with the handling of bullying, harassment and discrimination complaints, and a disparity in treatment between respondents and complainants, are preventing this measure from being achieved.

In terms of efficiency, there has been a slight deterioration in performance this year, owing in large part to increased volumes and resourcing issues. There have been improvements in the effectiveness of the system, most notably around flexibility and proportionality.

This year the Ombudsman has made two new **recommendations** and one **observation**, with the intention of driving further improvements to the efficiency of the system. The impact of these recommendations, if implemented, should have a trickle-down effect on the fairness and effectiveness of the system.

Performance against previous year

Ombudsman’s assessment	2023	2024
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		

		
<p>Good performance The Service Complaints system is performing well in this area.</p>	<p>Moderate performance The Service Complaints system has made improvements in this area, but further work is required.³</p>	<p>Poor performance The Service Complaints system is performing poorly in this area.</p>

³ Issues preventing a higher assessment may be outside of the immediate Service Complaints system.

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

Resolving complaints as early as possible, with the minimum formality, is a crucial part of the user experience. This means individuals engaging directly with the process, identifying the issues to be rectified and for any potential redress to be granted. Dealing with complaints at the lowest appropriate level can also result in swifter resolutions, improving the efficiency of the system.

The introduction of the My Complaint app, along with the continued use of Central Admissibility Teams, means that when Service personnel raise their grievances, they go to the Service Complaints Teams (SCT) for processing. While these measures do improve accessibility and confidence in the system, as highlighted in last year's Annual Report, this can also mean that the chain of command loses the opportunity to offer swift, local resolution on less complex matters. **Recommendations 6.1** and **6.3**, made in 2021, sought to address this by encouraging a process whereby cases which are suitable for local resolution can be raised and recorded through the Service Complaints system, but resolved locally where appropriate.

Work on these recommendations continues and has made good progress, with a formal process being developed. Separately, each of the Services has embraced the intention of these recommendations by actively considering the most appropriate method of resolution for different complaints. As an example, the Royal Navy succeeded in resolving 90 complaints to the satisfaction of the complainant, without the need for a formal investigation. This is reflected in SCOAF's Service Complaints User Feedback Survey, where an increased number of users of the Service Complaints system reported that there had been some attempts at informal resolution – 49% compared with 42% last year, which is positive.

It is important that individuals still have the option and right to escalate to a full investigation. However, in many cases, there is an issue that simply needs fixing, and the outcome recorded, so that learning can be taken on board. This also means that where a full investigation is not required, resources are freed up for more complex cases. I am pleased that the Services have adopted this shift in thinking, and are actively considering cases for appropriate informal resolution. SCOAF continues to discuss these cases on a regular basis, so for this year I am satisfied that this measure can be reported as having been met.

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. The target leaves a 10% allowance for Service Complaints that are too complex to be resolved within that 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 of the process, particularly from the perspective of those raising complaints.

Therefore, when investigating complaints about delay, SCOAF will consider the time taken for an admissibility decision to be made, as well as the time being taken to investigate the complainant’s concerns.

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. This 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.

Performance against this measure has always been considered against a sole KPI. However, SCOAF considers that this measure is too broad to provide meaningful insight into the performance of the system. There is a wide variance in the time taken to resolve complainants’ concerns for different categories, and for different complexities, of complaint. While the Ombudsman remains content that the 90% KPI is appropriate as an overarching measure, this is too crude, in isolation, to assess the performance of the system. The Ombudsman therefore recommends the development of a suite of further measures under **recommendation 9.1**, to better monitor and analyse performance in this area.

Delays at admissibility

Joint Service Publication 831 – Redress of Individual Grievances: Service Complaints ([JSP 831](#)) says an admissibility decision should be made by a Specified Officer within ten working days of a statement of complaint being acknowledged. Whilst the situation does remain vastly improved from previous years, SCOAF has noted a number of cases in 2024, where individuals have faced a significant wait before receiving an admissibility decision. SCOAF acknowledges that the introduction of the new Case Management System and the My Complaint app, as well as the increased volume of complaints, have all had an impact on the Services’ ability to keep pace with demand at the initial stage of complaints. It has also been noted by the Services that the quality of complaint submissions has deteriorated since the introduction of the My Complaint app, meaning further work is required in the early stages of a complaint.

The Ombudsman recognises this, and understands the benefits of investing time in the early stages to ensure a complaint is understood. However, it is important that performance in this area does not deteriorate any further. In 2024, 33% of admissibility decisions were made within the recommended 10 working day period, with the average being 3.3 weeks.

Delay within the Service Complaints system

The overall timeliness figure in 2024 was 64% (old KPI) for cases which were deemed admissible (63% under the new KPI). This represents a deterioration of 10% compared with 2023, under the old KPI. However, data for the new KPI was recorded but not reported for 2023, and this metric demonstrates only a 1% drop in timeliness. Under the new KPI, which provides a more accurate picture of performance, both the Royal Navy and the Army showed an improvement. The RAF experienced a drop in performance, which is discussed in further detail in [Chapter 2](#).

The overall average handling time for all Service Complaints remains steady at 22 weeks in 2024 (21 weeks under the new KPI), further improving the user experience. However, the time taken to resolve cases that are appealed remains a concern. The average resolution time for a case where an appeal was admitted was 33 weeks in 2023: for 2024, this figure was 29 weeks. Whilst this does demonstrate an improvement, it remains the case that this is simply too long and can discourage individuals from pursuing their complaint.

“The length of the process makes it almost impossible to reach an acceptable outcome because by the time the process has run its course it is too late to enact a meaningful plan to redress the reason for the complaint.”

The changes to the handling of appeals, introduced in 2022, were intended to ensure they have a tighter focus, centred around admissible grounds. It is therefore unclear why appeals are still taking so long. The Ombudsman reiterates that a review of the number and category of complaints proceeding to appeal should form part of the continued work taking place under [recommendation 7.1](#).

In terms of undue delay on specific cases, the number of applications to SCOAF asking for an investigation into undue delay increased by 14%. However, we found undue delay in 66% of the investigations we completed, compared with 81% last year. It should also be noted that many individuals may not raise a separate undue delay application, but will include this aspect of case handling when asking SCOAF to investigate maladministration. The main drivers of delay in 2024 were staff shortages, along with backlogs and queues created by the significantly increased number of admitted complaints, which continued the trend observed in previous years. This reinforces the need for the work outlined in [recommendation 7.1](#) to be taken forward, to ensure the system can cope with these issues.

Operates to keep up with demand

In 2024, the Services experienced a further 6% increase in the number of Service Complaints admitted, which represents a continuation of a significant shift in demand. The number of complaints admitted to the system has risen 74% in the last three years. The Services closed fewer cases (1,285), than they ruled admissible (1,302) in 2024. This has naturally resulted in a slightly higher number of cases that remain in progress.

However, the Ombudsman notes the difficulties the Services have faced in keeping pace with the increased demand and does not consider that this represents a significant issue. Therefore, this measure continues to be achieved from the perspective of the individual Services. The continued importance of **recommendation 7.1** cannot be understated, as it will allow for forward planning to deal with any increase in demand. Further work should be undertaken to identify the resources required to keep pace with such increases in demand.

A further issue crystallised in 2024, which relates to the large scale submission of complaints relating to a single issue, similar to a ‘class action’ complaint. A significant number of complaints relating to accommodation (around 3,500) were submitted. These complaints can be made using the Service Complaints system, as they concern individuals who consider they have been wronged as a result of their Service life.

However, this volume of complaints represents three years of complaints, submitted at once. The system as designed simply cannot absorb an influx of this nature. There are also other considerations when mass complaints are submitted, such as ensuring consistency of approach and decision making. As a result, the Ministry of Defence identified that a bespoke process would need to be put in place to deal with these complaints, so as not to flood the system.

SCOAF agrees with this approach – there is a balance to be struck between ensuring that mass complaints are dealt with swiftly and appropriately, and not derailing the processing of more ‘standard’ complaints.

However, the Ombudsman is disappointed that it has taken so long for this bespoke process to be designed and delivered by the Ministry of Defence. 1,175 complaints of this type had been submitted by 31 December 2023, with a similar number submitted in the first three months of 2024. Despite this, as of 31 December 2024, the process to be followed for these complaints had not been finalised, and admissibility decisions had not yet been issued for all of these cases. It cannot therefore be said that the Service Complaints system has operated to keep up with demand in 2024.

It is feasible that this situation could arise again in the future. Changes to policy can create situations that affect large numbers of Service personnel, who may consider themselves wronged and who want to submit a complaint as a result. For this reason, the Ombudsman has proposed **recommendation 9.2**, to ensure that future mass complaints are dealt with more efficiently.

SUMMARY – is the system efficient?

Performance continues to fall short of the KPIs, and the time taken for appeals remains a concern. Furthermore, the continued increased volume of complaints received has affected the Services’ ability to keep up with demand in 2024. In addition, the Service Complaints system itself cannot currently absorb the mass submission of complaints. The system cannot therefore be reported as being efficient – however it is important to understand that this measure is highly volatile, and is in large part dependent on volumes received.

Effective

An effective complaints system is one that:

- People have knowledge of.
- People have confidence in.
- Has clarity of purpose.
- Is flexible and proportional.
- Acts on the results of complaints and lessons learned to bring about change.

People have knowledge of the system

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.

The figures reflecting knowledge of the Service Complaints system reported by the Armed Forces Continuous Attitude Survey (AFCAS) in 2024 remain steady, with 81% of users reporting some knowledge of the system, and 57% knowing about SCOAF.

The Ombudsman has continued the programme of engagements in 2024 (see [Appendix E](#)) with the intention of both gauging, and increasing, awareness of the complaints process. These engagements include visits to individual units, tri-Service meetings and workshops, speaking events, and training sessions. During these engagements, the Ombudsman noted that there is a general level of awareness that the Service Complaints system exists and can be accessed by personnel. However, knowledge of how to raise a complaint (including the time limits for doing so), the process to be followed in an investigation, potential outcomes and access to SCOAF were not well understood.

It is recognised that individuals may not require detailed knowledge of the system until they have need of it, and this information should therefore be easily accessible. The role of Assisting Officers is vital in helping individuals navigate the Service Complaints system. The Ombudsman is pleased to note that an increased number of users of the Service Complaints system reported that they had been offered the services of an Assisting Officer: 83% compared with 74% last year, which is extremely positive.

People have confidence in the system

To ensure user confidence in the complaints system, Service personnel 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 in 2024, 12% of Service personnel said they had experienced bullying, harassment and discrimination in the last 12 months. However, similar to last year, only 13% of those individuals went on to make a complaint. The reasons given for not raising complaints were that personnel did not believe anything would be done about it (60%) and that complaining would adversely affect their career (52%). These indicate that confidence in the system, particularly for those experiencing inappropriate behaviours, remains worryingly low. Of particular concern is that 14% of those who said they had experienced bullying, harassment and discrimination said that they were discouraged from raising a complaint.

The Ombudsman is pleased that **recommendation 7.3** has been delivered, with a process established for reviewing the handling and outcomes of cases which do not form part of SCOAF’s usual casework. This provides an additional layer of oversight, which should give individuals confidence that there are checks, balances and quality review measures in place throughout the Service Complaints process.

Since the establishment of the Service Complaints system in 2008, confidence in, and the effectiveness of, it has remained low. To a certain extent, an individual’s level of confidence in the system will be driven by performance in other areas – confidence may well increase if Service personnel are persuaded that the system is operating efficiently, effectively and fairly. Continued visible efforts to deliver improvements to the system, along with outreach and engagement work, are essential to increase trust and confidence in the system.

Has clarity of purpose

The Ombudsman, through the outreach and engagement work conducted in 2024, again noted that individuals do not understand how the Service Complaints system and disciplinary processes sit alongside each other. A continued focus on our outreach and engagement will assist with this. There is also an opportunity to remind individuals of the purpose of the Service Complaints system when communications regarding the changeover to the Armed Forces Commissioner are developed.

Furthermore, a review of **recommendation 7.2** should take place (under the standard operating procedure established in **recommendation 7.4**) to establish whether the dedicated Service Complaints area on Defence Gateway requires further work.

As set out under Efficient, the Ombudsman notes that the Services have embraced the intention of **recommendations 6.1** and **6.3**, which reinforce that the purpose of the system is to resolve grievances – and that resolution may look different for some cases, depending on the circumstances.

Is flexible and proportional

All complaints are unique to the individual circumstances, and those involved will have differing needs. To be effective, a complaints system should be flexible enough to adapt the approach in order to support resolution. The Ombudsman is satisfied that performance in this area has improved, however there is still more that can be done.

In 2024, 65% of individuals responding to SCOAF's Service Complaints User Feedback Survey said the system did not take account of their individual circumstances, although the exact nature of those circumstances is unclear. Whilst this represents another year of improvement (compared with 71% in 2023 and 81% in 2022), this figure remains concerning. The implementation of **recommendations 6.1** and **6.3** should help to improve experiences of the system in this regard, and the Ombudsman notes that the Services' willingness to explore alternative resolution in the early stages of complaints has improved the flexibility of the system.

The Ombudsman is pleased to note an ongoing commitment by the Services in 2024 to speak directly to individuals, via telephone and Teams meetings, as appropriate. This is of particular importance when defining what aspects of the complaint will be investigated. The Ombudsman is pleased that there continues to be a marked increase in Specified Officers engaging with complainants prior to making admissibility decisions, which provides an opportunity to ensure that the issues are understood.

As set out in previous years' Annual Reports, the proportionality of full complaint investigations remains a slight concern. As part of **recommendation 7.1**, SCOAF ran a workshop in 2024 with the tri-Service SCTs to identify areas where evidence gathering and bundling can be appropriately scaled back. This was in order to increase effectiveness and so as not to overwhelm users of the service.

This work has progressed further, with a bespoke workshop session delivered to Army SCT Case Managers and Investigating Officers in December 2024. Similar sessions are scheduled for delivery to the Royal Navy and RAF in 2025.

Acts on the results of complaints and lessons learned to bring about change

The Ombudsman is committed to ensuring that feedback and learning from all complaints is shared and that changes are made as a result.

“Many of SCOAF's recommendations are for apologies, and there are often organisational lessons identified [...] in final reports, but no assurance that these lessons are implemented and result in tangible improvements to the way Service Complaints are carried out.”

In 2024, quarterly meetings with the Services continued and were of great value. These offer an opportunity for trends and feedback to be discussed and actions agreed, in terms of the Ombudsman's observations on specific cases.

It is of concern that only 4% of individuals responding to SCOAF’s Service Complaints User Feedback Survey said the underlying issue at the heart of their Service Complaint was resolved. However, this figure must be considered in the context of only 12% of Service Complaints being fully upheld. Furthermore, the inference is that, in approaching SCOAF (and therefore accessing our survey), these individuals are more likely to be unhappy with the outcome of their complaint.

A key issue of the Service Complaints system is that resolution of individual grievances does not necessarily address any underlying problems with policies or processes. Under the new Armed Forces Commissioner, it is anticipated that further, in-depth work could be carried out to find out whether, in situations where a complaint is not upheld because policy was applied correctly, that underlying policy is fair.

SUMMARY – is the system effective?

There have been improvements in the proportionality and flexibility of Service Complaints resolution. However, trust and confidence in the system remain low. Whilst the system cannot yet be reported as being effective, the completion of outstanding recommendations and continuation of existing measures will go a long way to ensuring this is met in the future.

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

As reported in previous years, the Ombudsman does not currently have concerns over the impartiality and independence of the Service Complaints system. The Central Admissibility Teams continue to work well and ensure that the chain of command does not have any involvement in determining admissibility.

The vast majority of Service Complaint investigation decisions are now made by Voluntary ex-Regular Reserve (VeRR) Decision Bodies and the quality of these decisions has continued to improve. Furthermore, the introduction of dip sampling under **recommendation 7.3** has allowed SCOAF to view the outcomes on cases which we would not normally have had access to. Although this process is in the early stages, the first round of samples has been completed and the Ombudsman did not note any significant causes for concern.

Despite this, in 2024 only 38% of individuals who had raised a complaint reported to AFCAS that they were happy with the objectivity and fairness with which their complaint was handled. This perception of the system remains a concern. However, it must also be recognised that dissatisfaction with the ultimate outcome of a complaint can often influence users' experience of the system as a whole.

The Ombudsman remains supportive that the relevant Service should carry out the initial investigation of, and make the decision on, complaints. As the organisation responsible for the environment in which a complaint arises, it is essential that the Services are given the opportunity to correct any issues and put things right. SCOAF continues to play a vital role in overseeing these processes and providing external assurance.

“In comparison to civilian companies the MOD goes to extraordinary lengths to deal fairly with complaints. Investigations and determinations are very detailed.”

The Ombudsman remains satisfied that whilst a positive and collaborative relationship has been established with both the Ministry of Defence and the Services, SCOAF is able to assess the performance of the system with objectivity and complete independence. There have been no changes to the way SCOAF operates and no barriers to discharging the Ombudsman’s statutory functions.

Has openness and transparency

Of those responding to SCOAF’s Service Complaints User Feedback Survey, only 20% of surveyed complainants found the process to be simple and straightforward, which represents a drop of 8% from last year. Whilst disappointing, it must also be noted that the system itself has not changed significantly, except for the introduction of the My Complaint app. It is therefore not clear what has driven this shift. Conversely, 41% of individuals who were party to a complaint reported to AFCAS in 2024 that they felt positive about the information and updates they had received, which has risen 5% since last year.

Whilst the Ombudsman is satisfied that the process for handling Service Complaints is clearly set out in policy, it remains the case that individuals may not understand what is happening with their complaint, or what they can expect from the process.

The appointment of Assisting Officers plays a vital role in bridging the gap in understanding and offering support. 83% of individuals responding to SCOAF’s Service Complaints User Feedback Survey were offered the services of an Assisting Officer, compared with 74% in 2023, which is encouraging. In addition, 53% of individuals who were party to a complaint reported to AFCAS in 2024 that they were satisfied with the support provided by their Assisting Officer, which has risen 6%.

Is accessible

Overall, accessibility of the system continues to improve, with the establishment of the My Complaint app, which allows individuals to submit and track their complaint online. SCOAF provides an important function in referring complaints into the system, to ensure that all Service personnel are able to access it. In 2024, SCOAF experienced a 9% decrease in the number of incoming enquiries, which may reflect improved visibility and accessibility of the system.

There remains some confusion around whether complainants should apply for an appeal, or whether they can ask SCOAF for a substance and/or maladministration investigation, on the basis that they are not aware of any valid grounds of appeal. Examples of what can be brought as an appeal and an explanation of the different options on receipt of a Decision Body decision should be included as part of **recommendation 7.2**.

Does not disadvantage or discriminate

From the responses to SCOAF's Service Complaints User Feedback Survey, 94% of individuals said their health and wellbeing was impacted negatively by the Service Complaints system. This figure remains worryingly high, and the emotional impact of the Service Complaints system cannot be underestimated.

For individuals who have raised a complaint, the issue is something which matters greatly to them, and they tend to experience worry and concern throughout the process, regardless of the ultimate outcome. The time taken to reach a decision means that these feelings continue for longer than is desirable, and the impact of that is subsequently greater.

For respondents to a complaint, any such feelings are coupled with a sense of helplessness and, in many cases, fear around the outcome. Throughout engagements this year, the Ombudsman has noted a growing sense of unfairness amongst respondents to a complaint, who do not have access to SCOAF if they have concerns about the way a complaint has been handled. This has been echoed by the tri-Service SCTs, who continue to raise concerns about the mental wellbeing of respondents, and the limited support that they are able to offer.

The Service Complaints system is a complainant focused process, designed to determine whether an individual has been wronged. With that in mind, it is correct that a respondent to a complaint should not be able to seek to overturn the outcome of the complaint raised. However, respondents are an important part of the process, and they also have the right to be treated fairly.

In Annual Report 2017, **recommendation 2.8** asked that the Ministry of Defence reviewed legislation in order to establish a mechanism for respondents to ask SCOAF to investigate undue delay in the handling of a complaint. However, this recommendation was rejected.

The Ombudsman considers that this issue is still a cause for concern, and represents a serious threat to the welfare of Service personnel. This is compounded by the fact that SCOAF has historically upheld more than half of all maladministration investigations, which often include complaints of undue delay in resolving the matter. This indicates that there may well be additional issues with the handling of complaints as experienced by other parties, of which SCOAF does not have oversight.

For this reason, the Ombudsman has made an observation in this year's Annual Report, that it would be beneficial for SCOAF to be able to look at all aspects of maladministration in a complaint, regardless of who raises the concern. It should also be noted that the Armed Forces Commissioner, who will be in post from 2026, is empowered to look into any such issues as they consider relevant to the welfare of Service personnel. The Commissioner would therefore be able to take this work forward under their legislative remit, should they choose to do so.

Although the system itself does not actively discriminate, it remains the case that those who raise complaints are still waiting too long to have them resolved. This is of particular

importance when looking at those complaints relating to bullying, harassment and discrimination, which remain the slowest cases to resolve. Within this category, cases which do not go to appeal take on average 5 weeks longer to resolve (26 weeks), and this rises to 33 weeks when appealed.

There is a clear disadvantage to the parties involved in complaints which relate to protected characteristics, such as race, sex, pregnancy and maternity, and poor behaviours. These types of complaints are often very complex and therefore take the longest to complete. In addition, female and ethnic minorities Service personnel remain overrepresented within this category of complaint, and are therefore disproportionately affected by these failings within the system.

“Service Complaints relating to sexual violence and management of such, is a traumatic issue and frustrating that my adjustments needed weren’t understood to start with [...] the MOD shouldn’t be making victims have to approach SCOAF.”

Achieves appropriate outcomes

Individuals using the Service Complaints system should feel assured that the correct resolution will be achieved. In 2024, SCOAF upheld, either partially or fully, 44% of substance investigations (compared to 48% in 2023). It is important to note that SCOAF employs a triage system and only investigates cases where it appears to be a proportionate use of the Ombudsman’s powers, so these statistics should be viewed in light of that. Instances where the Ombudsman recommends a complete reconsideration of a final decision are uncommon. Typically, when SCOAF upholds an aspect of a complaint, it relates to a matter where the Service’s final decision was considered to be insufficient.

The cases SCOAF investigates only represent a small proportion of those that go through the Service Complaints system. The implementation of **recommendation 7.3** has allowed the Ombudsman to have oversight of cases which would not normally come through to SCOAF. In the first round of dip sampling, conducted in late 2024, the Ombudsman did not record any concerns with the determinations reached or remedies offered.

SUMMARY – is the system fair?

Overall, the Ombudsman is satisfied with the fairness of the system, the processes followed and the outcomes reached. However, there remain serious concerns around the experiences of those who have cause to raise complaints about bullying, harassment and discrimination, particularly when female and ethnic minorities Service personnel are disproportionately affected. Furthermore, the inability for respondents to raise issues around the way they are treated during investigations also remains a cause for concern.

New recommendations

Recommendation 9.1 – that the Ministry of Defence agrees to adopt a suite of supplementary KPIs, designed by SCOAF, to provide a more comprehensive overview of measurable performance metrics within the system. The overarching timeliness KPI is to remain in place. However, the supplementary KPIs are to be designed and owned by SCOAF, in collaboration and discussion with the Ministry of Defence and the Services. To be completed by January 2026.

Recommendation 9.2 – that the Ministry of Defence works with SCOAF and the Services to develop an agreed, formal process for dealing with mass complaints, to include guidance as to what constitutes a mass complaint, and the situations in which deviation from existing Service Complaint policy is anticipated. To be completed by January 2026.

Observation:

The inability of respondents to approach the Ombudsman and highlight issues about the way they are treated or the way the complaint is investigated represents an injustice, which materially affects the welfare of Service personnel. It would be beneficial for SCOAF to be able to formally receive feedback from respondents, in order to provide a more robust view of the performance of the system.

It should also be noted that the Armed Forces Commissioner, who will be in post from 2026, is empowered to look into any such issues as they consider relevant to the welfare of Service personnel. The Commissioner would therefore be able to take this work forward under their legislative remit, should they choose to do so.



Chapter 2 – The work of the Service Complaints system in 2024



Chapter 2 – The work of the Service Complaints system in 2024

Overview

The Service Complaints system is an internal workplace grievance process for serving or former members of the UK Armed Forces to raise concerns about matters relating to their Service and seek redress.

Policy, procedure and guidance for handling Service Complaints, including details of time limits for bringing complaints, are set out in [JSP 831](#).

Who raises complaints?

Regular Service personnel, Veterans or Reservists may raise a Service Complaint.

Proportionally, more complaints were raised by RAF personnel than the other Services in 2024. Also, Officers and Regular Service personnel were proportionally more likely to raise Service Complaints than other ranks or Reservists.

Female and ethnic minorities Service personnel were more likely to submit a complaint than their counterparts, and a higher proportion of these related to bullying, harassment and discrimination.

What do Service personnel complain about?

In 2024, the three main categories of Service Complaints were:

- career management (38%);
- bullying, harassment and discrimination (21%); and
- pay, pensions and allowances (14%).

Service Complaint handling

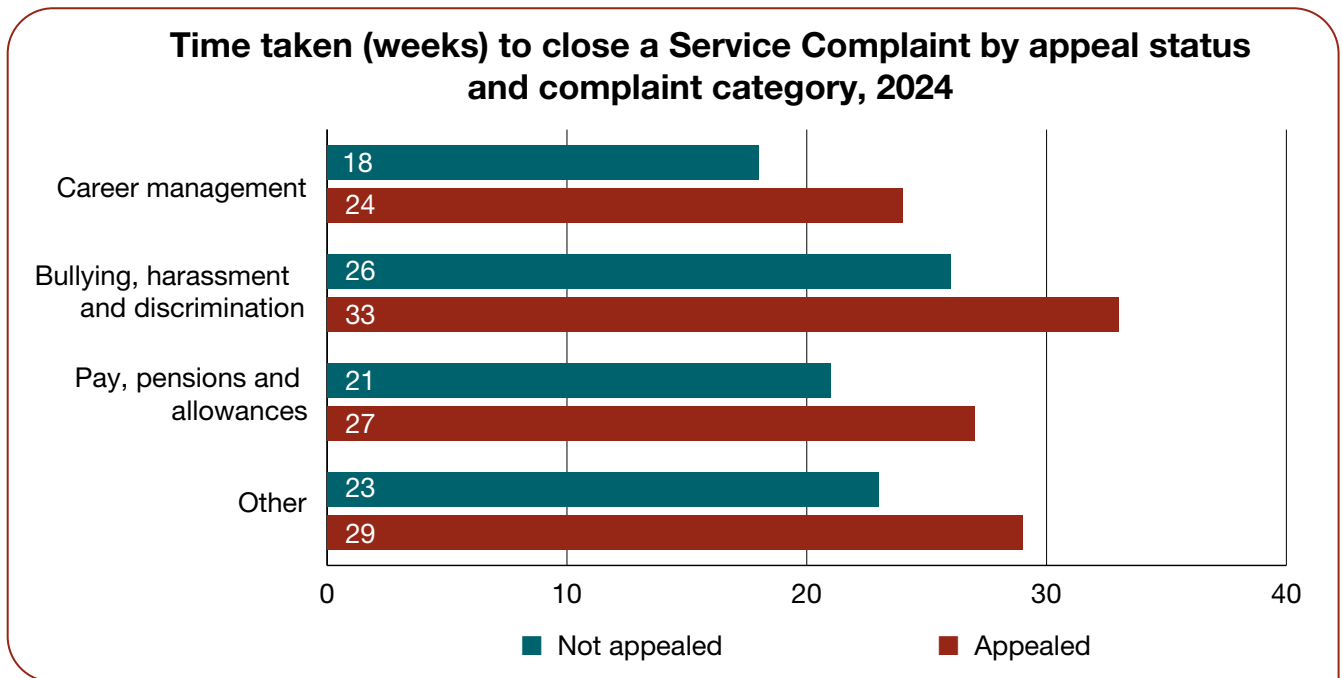
How many Service Complaints did the Services handle?

In 2024, 1,302 Service Complaints were ruled admissible, which is a slight increase (6%) from last year. Despite this increased volume, the Services succeeded in closing 1,285 complaints over the year. Of the 638 cases remaining open as at 31 December 2024, 31% were 'red flag' cases (i.e., cases which were not 'stayed' or suspended and which had been open for more than 24 weeks).

How long did the Services take to process a Service Complaint?

The average time taken to close a Service Complaint was 22 weeks, which is consistent with last year's performance.

The average number of weeks to close a case which was not appealed was 21 weeks. However, cases which were appealed took an average of 29 weeks to close.



The Services are set a KPI target of resolving 90% of all Service Complaints within 24 weeks. In 2024, the Service percentage of in-year Service Complaints closed within target was 64% (old KPI). This represents a decline compared with last year's figure of 74%, and is some way short of the KPI target.

Service Complaint outcomes

What was the outcome from the Service Complaint?

Normally, the outcome of a Service Complaint is initially decided by a Decision Body following an investigation. In 2024:

- 42% of Service Complaints were known to be partially or fully upheld.
- 44% of Service Complaints were known to be not upheld.
- 9% of Service Complaints were known to be withdrawn before a final decision was made.
- 4% of Service Complaints were known to be remedied before a final decision was made.⁴

⁴ Figures may not add up to 100% due to rounding.

Appeal process

Apart from ineligible cases⁵, a decision made on a Service Complaint can be appealed by a complainant if:

- there was a material procedural error.
- the decision was based on a material error as to the facts of a case.
- there is new evidence that could materially affect the outcome of a case.

In 19% of eligible Service Complaints, the complainant sought an appeal, with 3% of eligible appeals being ruled admissible.

What if a complainant was not happy with how a complaint was handled or its final outcome?

SCOAF investigations

If a complainant is unhappy with a decision that their complaint or appeal is inadmissible, they can ask SCOAF to review the decision. In addition, SCOAF can investigate undue delay in the handling of a Service Complaint or a Service Matter⁶.

As part of the Service Complaints system, a complainant may ask SCOAF to investigate the substance of a Service Complaint or alleged maladministration in the handling of a Service Complaint, after a final determination has been made.

Single Service performance

While the annual assessment of the Service Complaints system is based on Service performance, 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 2024, and an assessment of their performance in general. This performance assessment is mainly based on statistical returns⁷ from the Services and a written narrative provided by each Principal Personnel Officer (PPO) concerning their Service's performance. A statistical factsheet for each Service can be found in [Appendix G](#), and the narratives have been reproduced in full at [Appendix H](#), with the consent of the PPOs.

5 Service Complaints decided by either a Service Board or the Defence Council are not eligible for the Service Complaints appeal process.

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

7 Each Service provides SCOAF with an Annual Statistical Return, which SCOAF uses to produce this assessment.

Royal Navy⁸



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KPI – 61% Timeliness Rate (Target: 90%)

In 2024, the Royal Navy ruled 310 complaints admissible as Service Complaints, which was a 10% rise compared with last year, and a 108% increase over the last three years.

The Royal Navy succeeded in closing 10% more complaints than last year, which broadly keeps pace with demand. There was a slight rise in the number of red flag cases open at the end of the year. However, the average resolution time remained steady at 23 weeks, and under the new KPI the Royal Navy did see improvements.

Year	Cases ruled admissible	Cases closed	Cases open as at 31 December	Red flag cases	Average time taken	Timeliness rate (old KPI)	Timeliness rate (new KPI)
2023	283	267	161	46	23 weeks	70%	57%
2024	310	294	164	59	23 weeks	61%	61%
Trend	+10%	+10%	+2%	+28%	Steady	Decline	Improvement

⁸ Royal Marine Service Complaints are included in the figures for the Royal Navy Service Complaints as both are dealt with by the same Secretariat.

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

- Continued development of an internal assurance regime, allowing for scrutiny of those complaints not referred to SCOAF. This analysis has led to the introduction of measures which have improved the way bullying, harassment and discrimination cases are investigated, which in turn has reduced the average time taken to resolve these types of complaint from 49 weeks in 2023, to 36 weeks this year.
- An extensive outreach programme under which members of the SCT briefed at a number of key career development courses. This included the Commanding Officer/ Executive Officer designate course and several professional development courses, increasing awareness and access to the process, alongside the My Complaint app.

The Royal Navy has also introduced a standard procedure for the Royal Navy Culture Team to receive copies of all behavioural-related decision letters, enabling them to act upon findings and increase organisational learning across the Services. Through programmes such as Operation Rockland⁹, the priority and commitment in the determination to root out inappropriate behaviour is clear. Early indications show signs of success in the reduction of the number of complaints relating to bullying, harassment and discrimination for the third successive year, from 30% of all complaints in 2022 to 19% in 2023, and 14% in 2024. This is now the lowest at any point in the past eight years.

In its narrative, the Royal Navy recognises the need to do more to understand reasons why women and ethnic minorities are proportionally more likely to raise a Service Complaint than their white, male, counterparts. Following the recent Army-led review, the Royal Navy will work with their single Service counterparts and the Ministry of Defence to examine this in 2025.

The Ombudsman acknowledges the efforts the Royal Navy has made this year and notes the difficulties in recruitment, but also the overwhelming benefit in prioritising a fully-resourced team. The focus on informal resolution is a pragmatic one which, managed well, can only benefit the complainant and the Service. The Royal Navy has continued on a positive trend with very low numbers of overturned admissibility decisions, which is welcomed, alongside a declining trend in the number of cases experiencing delay.

9 The systematic investigation and resultant actions following the allegations of unacceptable sexual behaviour in the Submarine Service.

Army



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KPI – 63% Timeliness Rate (Target: 90%)

In 2024, the Army ruled 645 complaints admissible as Service Complaints, which was a 5% rise compared with the previous year, and a 76% increase over the last three years. Despite this, the Army succeeded in closing 10% more cases than last year. This has led to a slight fall in the number of cases open at the end of the year compared to the start for the second year running.

The in-year timeliness rate of 72% (old KPI) shows the best performance to date for the Army and improvement for the sixth consecutive year, with the target within reach. Under the new KPI, the Army achieved 63%, which is a 10 percentage point improvement on 2023. The average median resolution time also saw an improvement, with cases taking 22 weeks to close, compared with 24 weeks in 2023.

Year	Cases ruled admissible	Cases closed	Cases open as at 31 December	Red flag cases	Average time taken	Timeliness rate (old KPI)	Timeliness rate (new KPI)
2023	614	628	348	81	24 weeks	67%	53%
2024	645	691	300	78	22 weeks	72%	63%
Trend	+5%	+10%	-14%	-4%	Fall	Improvement	Improvement

Career management complaints, which made up 41% of cases in 2024, remain the quickest Service Complaints to resolve: the specialist career management cell attached to the Army Personnel Centre achieved a KPI of 96% timeliness.

By the end of 2024, there were just 78 red flag cases. Of those, 23 were legacy cases, which is 44% less than the preceding year. Finally, the Army has achieved the Ministry of Defence target median of 10 working days for making an admissibility decision for the first time.

The Army made two detailed observations in its narrative:

- **Volume of admissible Service Complaints.** There has been a significant increase in the volume of Service Complaints being submitted. This is due in part to the digitalisation and launch of the My Complaint app and the introduction of central admissibility in June 2022, which removed the Commanding Officer from the system. *“The Army remains focussed on working with the MOD and SCOAF in developing the Local Grievance Resolution model to address this imbalance to progress [recommendations 6.1](#) and [6.3](#).”*
- **Female and ethnic minorities representation.** Increased levels of Service Complaint submissions in these two groups remain a concern. *“The Army led on a review with data from all three Services pertaining to [recommendation 1.10](#). The recommendations will be taken forward with SCOAF, the Ministry of Defence and the single Services.”*

The Ombudsman is encouraged by the continued enthusiasm and engagement of the Army this year, and commends the performance achieved in the face of increased volumes of complaints. The Army has been at the forefront of delivering progress against [recommendations 1.10](#), [6.1](#) and [6.3](#), and has shown great commitment to further improving the system. The Ombudsman supports the delivery of the Army’s priorities for the coming year as identified in their narrative, which include local grievance resolution, optimised digitalisation and further research into Service Complaints.

Royal Air Force



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KPI – 63% Timeliness Rate (Target: 90%)

In 2024, the RAF ruled 347 complaints admissible as Service Complaints and this represents another year of increasing demands (6% rise). The volume of admissible complaints has risen 49% over a three-year period. The number of Service Complaints closed in 2024 has also risen. However, the number of cases open at the end of the year has risen significantly for the second year running. This has also resulted in a significant rise in red flag cases.

The in-year timeliness rate of 52% (old KPI) is a significant drop from the previous year, due to an increase of complaints received and a greater focus by the team on conducting in-depth investigations for complex complaints. The average median resolution time of 22 weeks has also risen from 2023.

Year	Cases ruled admissible	Cases closed	Cases open as at 31 December	Red flag cases	Average time taken	Timeliness rate (old KPI)	Timeliness rate (new KPI)
2023	328	204	125	10	18 weeks	90%	87%
2024	347	300	174	59	22 weeks	52%	63%
Trend	+6%	+47%	+39%	+490%	Rise	Decline	Decline

Key updates provided by the RAF are:

- As recommended by the Ombudsman in 2023, the RAF has sought to focus on quality of investigations, ensuring speed is not pursued at the expense of appropriate outcomes.
- The RAF has continued to review the process to ensure that all parties are treated fairly and receive support, whether they are complainants or respondents. As part of this process RAF SCT conducted a ‘Red Team Event’ to enable case managers and Deciding Bodies to review the ‘RAF Service Complaints Journey’ and make improvements, which will lead to the further streamlining of processes and simplification of literature.
- The RAF has continued to use case hearings in the majority of cases.
- To increase the ability to reach prompt informal resolution with the agreement of parties involved, the RAF has created a new role of Informal Resolution Officer to assist with identifying and actioning such cases.
- Noting complaints about career management and terms and conditions of Service continue to represent the highest proportion of complaints, the RAF has proposed a ‘Special to Type’¹⁰ complaints process relating to appraisals and career management disputes. It is expected that this process will be tested in early to mid-2025.
- The RAF will be reporting on the outcome of a workforce review to understand staffing requirements in early 2025.

The Ombudsman notes the efforts made by the RAF and commends them for their transparency and commitment to providing a quality service. The Ombudsman also continues to be supportive of the use of case hearings as a means of speaking directly to the parties.

The Ombudsman understands the challenges associated with a continued rise in the number of admissible Service Complaints. The increase in the number of complaints resolved in-year by the RAF is positive and it will be important for the Service to ensure that it can keep pace with the number of incoming complaints over the coming years. The Ombudsman therefore welcomes the additional initiatives being taken forward by the RAF.

¹⁰ ‘Special to Type’ complaints have their own procedures which must be followed before the Service Complaints process can be started.



Chapter 3 – The work of SCOAF in 2024



Chapter 3 – The work of SCOAF in 2024

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 Service's Secretariat directly to make their complaint.
- Review **admissibility** decisions made by the Services to not accept a complaint (either in whole or in part) or an appeal, to determine whether that decision was correct.
- Investigate **undue delay** in the handling of a Service Complaint or Service Matter.
- Investigate the **substance** and/or handling of a complaint (**maladministration**) once the internal Service Complaints process is complete.

What is a referral?

Individuals usually raise a complaint via their single Service Secretariat. If they do not want to do this, they can ask the Ombudsman to refer their Service Complaint directly to the single Service's Central Admissibility Team.

What is admissibility?

This is a decision made by the single Service Central Admissibility Team whether to accept or exclude a complaint from the Service Complaints system. SCOAF has the power to review admissibility decisions and make a finding to either uphold or overturn the admissibility decision.

What is undue delay?

In general terms it means the complainant thinks the time taken to process their complaint has been unwarranted, excessive or unjust.

What is substance?

This is what the Service Complaint was about. SCOAF can investigate the substance of a complaint, but is not a further level of appeal.

What is maladministration?

It means that something was wrong or improper in the way the Service handled the complaint. SCOAF can investigate allegations of maladministration in the handling of Service Complaints.

Key findings

Enquiries and Referrals

- 1,035 enquiries were received, which is down by 9% from last year’s 1,140.
- 124 referrals were made by SCOAF, which is down 29% from last year’s 174.

Volume

- We received 423 investigation applications, which is a 16% decrease from last year’s 505.
- 94% were eligible for investigation and 69% were investigated.
- All eligible admissibility and delay cases were investigated, but due to our triage process, not all eligible substance and/or maladministration cases were.
- We had no unallocated cases on 31 December 2024.

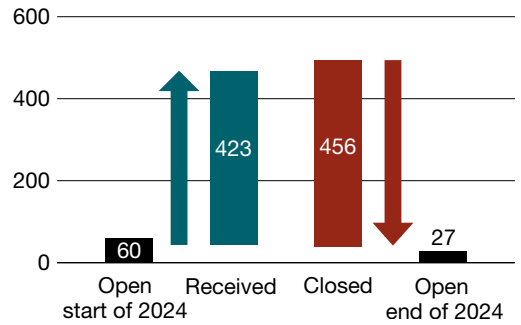
Timeliness

- 99% of investigations were completed within our time targets.
- The target was 17 working days for admissibility and delay cases, and 100 working days for substance and/or maladministration cases.
- The average time taken to carry out admissibility and delay cases was 3 weeks, made up of 1 week unallocated and 2 weeks investigated.
- The average time taken to carry out substance and/or maladministration cases was 22 weeks, made up of 8 weeks unallocated and 14 weeks investigated.

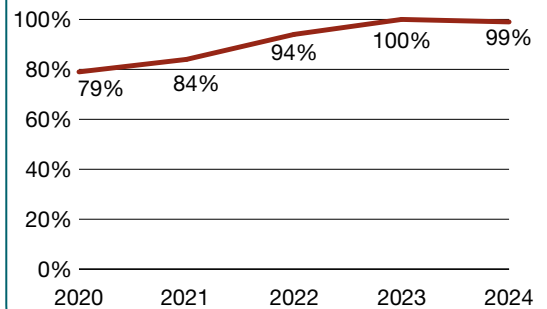
Outcome

- The investigations with the highest rate of being upheld were undue delay cases, at a rate of 66%.
- 44% of substance, 56% of maladministration and 6% of admissibility review cases were upheld.

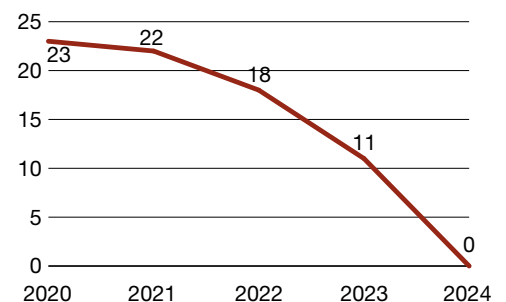
Investigation applications received and closed in 2024; Open at start and end of 2024

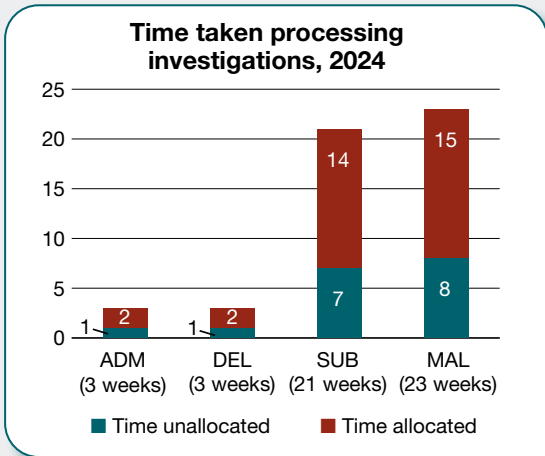
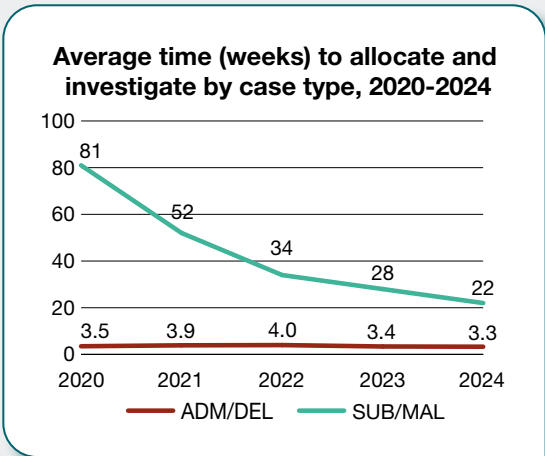
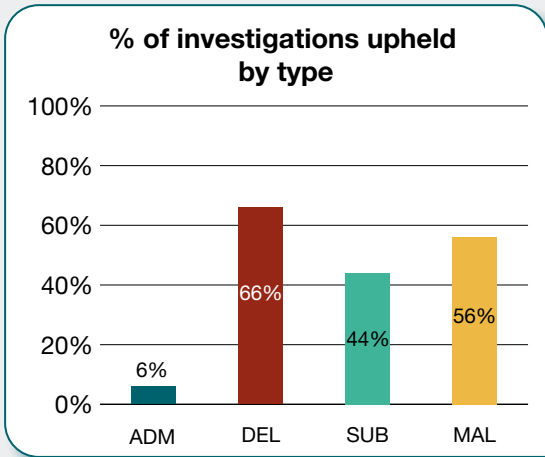
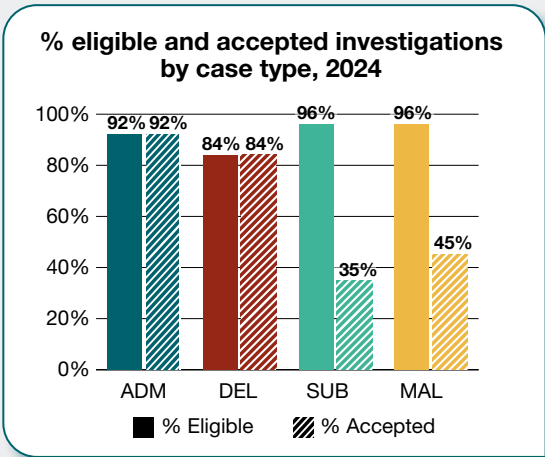
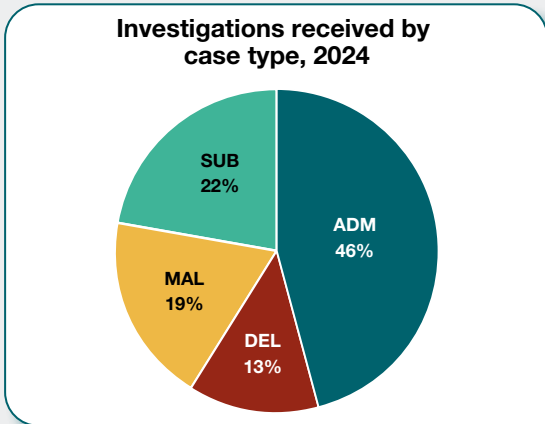
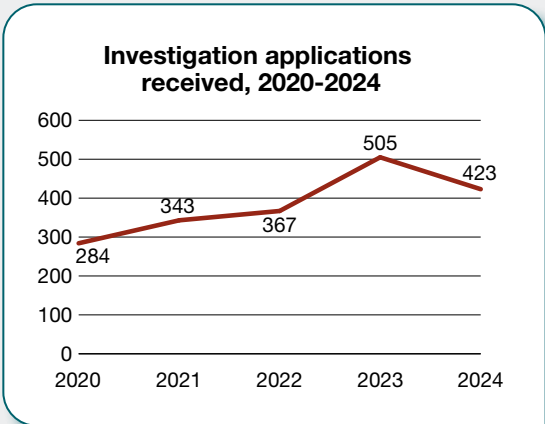
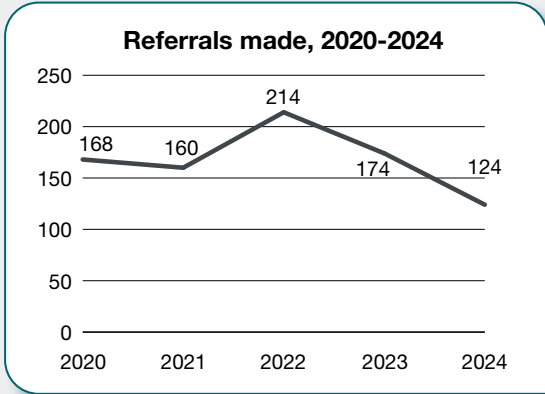
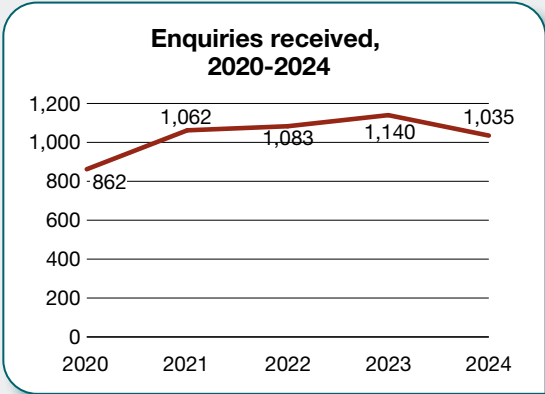


Investigation timeliness rate, 2020-2024



Unallocated substance and/or maladministration cases on the backlog, 2020-2024





Our performance

It has been another busy year for SCOAF, although we saw a slight reduction in the number of enquiries (down by 9%) and investigation applications (down by 16%). It is the third year that the timeliness KPI of carrying out 90% of investigations within our specified timescales has been exceeded, and this year we have achieved 99% in all areas. We completed 96% of all substance and/or maladministration investigations within 100 working days, which closely mirrors the Ministry of Defence policy that 90% of Service Complaints should be completed within 24 weeks.

We achieved this despite, again, not being fully staffed this year. We have carried on with our programme of continuous improvement to the way that we do things, which has ensured that we have performed to the best of our abilities. As a result, 2024 has been one of our best years of performance on record.

Recommendations and wider learning points

Following an investigation, the Ombudsman may make recommendations and/or wider learning points. In 2024, SCOAF made 88 recommendations and 41 wider learning points. The types of recommendations fell into the following categories:

- Apology – 34
- Process – 32
- Consolatory award – 20
- Action plan – 2

The reference to process relates to the Services not following the internal Service Complaint process properly. It follows that SCOAF makes a recommendation that the correct process is reminded of and should be followed.

Case allocation

As SCOAF's timeliness has improved, unallocated cases in the backlog have decreased from 11 substance and/or maladministration cases in 2023, to none in 2024.

By the end of December 2024, once our Enquiries and Referrals Team had sufficient information to pass a case to the Investigation Team, it was taking a matter of days for these types of cases to be allocated to an Investigator. By comparison, at the end of 2023, it was taking two months to allocate. This is a significant reduction in wait time for complainants before their concerns are investigated by SCOAF.

Continuous improvement

SCOAF strives to continuously improve our service to provide an excellent customer experience.

We recognised that it was important to reduce the number of cases in the unallocated backlog, as well as to reduce the wait time to no more than four weeks for complainants to have their case allocated to an Investigator. We decided to add these as stretch objectives to our 2024-2025 Business Plan.

SCOAF has been on a journey of continuous improvement during the last two years. In 2023, we carried out a significant investigation process review, with customer experience at the forefront. In our quest for timeliness and efficiency, it was vital that we maintained our high-quality decision making.

**“An incredible effort in such a short time frame.
Thank you for your support.”**

**“Thank you for conducting the investigation and taking the time
to clarify any questions I had throughout the process.
Your help made a very stressful and unpleasant time more bearable.”**

**“Thank you very much and very much appreciated for all of
your work!”**

At the start of 2024, we had already started to see the impacts of the changes to the way that we work. We restructured all our written communication, including reports. They are now more concise, easier to understand, and in plain language. We are managing expectations of complainants better from an earlier stage. If we are unable to investigate a complaint, we are informing complainants sooner and providing better explanations. By the end of 2024, we introduced a new internal Process Manual which captures all of our new ways of working.

Our process changes have resulted in greater efficiencies. Our unallocated case backlog by the end of 2024 had reduced to zero and the wait time for cases to be allocated to an Investigator had gone down to a matter of days rather than weeks and months. We have met and exceeded our timeliness KPIs, but have also met our ambitious stretch targets that we set out around reducing our backlog. Throughout this period, we have maintained high quality decision making and customer experience standards.

We have also continued to work on improving our external digital communications to ensure wider accessibility to SCOAF. Our online applications are now all embedded and have been refined. This has made it more accessible for individuals to submit their enquiries and applications to us. After carrying out an audit of our website, we have made changes to ensure all information is accessible and as user-friendly as possible.

SCOAF's successes over the last year contributed to the Ombudsman, Mariette Hughes being awarded with the Ombudsman Association's 2023-2024 Outstanding Contribution Award.

Customer satisfaction

Complaints about us

SCOAF received two complaints about our service in 2024. We investigated them both and did not uphold either complaint.

Other contacts were made to SCOAF to disagree with our decisions. When this occurs, we explain to complainants their option to seek independent legal advice with a view to applying for judicial review.

Judicial review

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

Service Complaints reform

On 15 June 2022, the Service Complaints system changed, with Service Complaints no longer being submitted through the chain of command but via single Service Secretariat Central Admissibility Teams. A change to the appeals timeframe was introduced, reducing it from six weeks to two weeks. Three grounds of appeal were also introduced.

It is evident that the Services have seen an increase in complaints since these changes were introduced. It has also resulted in a significant increase in the number of appeal admissibility review applications and substance and/or maladministration applications made to SCOAF. Between 2021 and 2024, the number of admissibility applications to SCOAF have increased by 79%, and substance and/or maladministration applications have increased by 16%, from 150 to 174. In 2024, 26% of admissibility applications to SCOAF related to appeal admissibility reviews. To put this in context, in 2021, the appeal admissibility applications only amounted to 7% of all admissibility applications received.

While it may not have been the intention of the legislative changes, not all complainants now appeal the outcome of their Service Complaint before making a substance and/or maladministration application to SCOAF. This is partly the reason for the rise in appeal admissibility applications to our office. SCOAF continues to engage with the Service Complaints Transformation Team to clarify and improve the process.

Resource and staffing

SCOAF has funding for 26 members of staff, including the Ombudsman.

The Chief Operating Officer oversees both the Business Team and the Operations Team.

The Business Team consists of: Head of Office, Policy and Improvement Manager, Statistics Manager, Communications Officer, Business Manager, Statistics Support Officer, Ombudsman's Executive Assistant and Business Support Officer. 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: Head of Investigations, nine Senior Investigators, three Investigators, Investigator Support Officer and two Enquiries and Referrals Officers. At the end of December 2024, SCOAF had five vacancies.

Staff engagement

People are an essential part of our business – without them, we cannot deliver against our objectives, our Business Plan and provide a high-quality service. Understanding the needs and concerns of those who work for SCOAF is key to us performing and is one of the drivers for many of the changes that we have made over the past year.

Following an all staff away day in 2023, we created an internal SCOAF Empowerment Charter, which supplements our values and behaviours in how we go about doing things together as a team. This is now embedded at SCOAF and regularly reviewed. All staff are encouraged to raise suggestions and better ways of working. Everyone is empowered to make SCOAF a better place to work and to keep making sure we are providing the best service for our customers. Not only have we seen great performance results this year, but we have also seen our best results on record in our annual People Survey.

Business Plan

Every year SCOAF issues a new Business Plan which flows from, and supports, our five-year Strategic Objectives and long-term vision. Having a Business Plan enables us to look back at work we have delivered, identify areas that need development and where we could design and implement new processes. This ensures we continue to grow and adapt as an organisation and continue to deliver a high standard of work to our stakeholders.

SCOAF's Business Plan is published on our website. For the period covering 1 April 2024 to 31 March 2025, we set 12 objectives. With a number of vacant positions during 2024, particularly in the Business Team, it has been challenging to progress and meet all of our objectives. Despite the challenges, our staff have shown great resilience and teamwork, and have excelled in meeting the majority of our objectives, some ahead of target.

Outreach and engagement

The Ombudsman carried out a comprehensive outreach and engagement programme in 2024. One part of the programme included outreach visits to military units, giving an opportunity to interact with the Armed Forces community and gain an understanding of their lived experience and Service life. These visits are split proportionately between each of the three Services, covering all of the UK, supported by SCOAF members of staff.

The visit format usually consists of group sessions, split into different ranks and levels, allowing individuals to discuss issues and provide feedback within their peer group. It is not only an opportunity for SCOAF to provide awareness of our service, but to also understand the real lived experiences of Service personnel. Being on base gives SCOAF a real understanding of Service life and enables us to collect feedback from surveys taken on the day. These visits are invaluable and provide information we cannot obtain from investigations alone.

SCOAF delivers training sessions and presentations in support of making the system better. One of the ways we do this is by speaking at the mandatory training courses offered to all new Commanding Officers in each of the Services. Our sessions provide an in-depth overview of the purpose of SCOAF, how it sits in the wider process and how it might affect them as new Commanding Officers in terms of dealing with complaints and interacting with our office.

Over the last year, we developed our training for each of the Services. We have delivered tone of language and writing training sessions to Decision Bodies and Appeal Bodies, as well as an investigation techniques session for SCTs. In each of these sessions we looked at practical ways of providing good complaints handling. We use real examples to show what good looks like when it comes to language and wording when writing a clear, concise and easy to understand decision. We have received positive feedback from our training and have seen changes and improvements as a result.

We held our fifth Stakeholder Symposium in 2024, which had the theme of 'Change is possible'. This was an event bringing together the key interested parties in the Service Complaints system and the work of SCOAF. It provided an opportunity for us to reflect on our work over the previous year, the work of the Services and the overall operation of the Service Complaints system. In particular, it highlighted the key successes in the progress to making the Service Complaint system more efficient, effective and fair, and what more needs to be done. As well as presentations, workshop sessions were held on the effect of complaints on different individuals and making an impact as an Ombudsman service. The workshops involved engaging discussions and networking between delegates, and the day culminated in a plenary panel session.



Chapter 4 – Annual Report recommendations progress



Chapter 4 – Annual Report recommendations progress

The Ombudsman's recommendations are made with the intention of improving standards or to address specific issues noted during the year, based on comments received from engagement surveys and observations made from investigations.

Recommendation deadlines are set based on the scope of the issue, with the aim to create improvements to the process with the Service person at the forefront.

To date, the Ombudsman has made 44 recommendations in their Annual Reports, varying between policy, process and cultural change.

In Annual Report 2023, the Ombudsman determined not to make any new recommendations to allow those made in 2022 to develop. The Ombudsman is pleased to note there has been significant work to implement the open recommendations with **recommendations 7.3** and **7.4** closed in 2024.

Recommendation 7.3, which focused on developing a formal process of quality review to allow for oversight and dip sampling, was formalised during 2024, with the agreement of a Service Complaints Assurance Framework in October 2024. The framework sets out the requirement for internal quality assurance to ensure the handling of Service Complaints meets the expected standards, and a process for dip sampling that enables SCOAF to undertake periodic reviews of a defined number of cases from each of the Services. The first round of dip sampling took place in November 2024, with the Ombudsman completing her review by mid-December. This recommendation will now form part of business as usual.

Recommendation 7.4 was created to ensure there was a mechanism by which all recommendations and/or changes made to the Service Complaints system could be monitored to ensure they were implemented and delivered the desired outcomes. Through collaboration with the Service Complaints Transformation Team a Service Complaints Change Measurement Tool has been devised. The aim of the tool is to capture, measure, and review key changes made to the Service Complaints system. The tool will be owned and reviewed by the Service Complaints Transformation Team with SCOAF invited to bi-annual reviews. Dates for the first of these reviews have been scheduled for 16 April and 15 October 2025.

In terms of the open recommendations, continued progress has been made. For example, in relation to **recommendations 6.1** and **6.3**, the Service Complaints Transformation Team has facilitated workshops to discuss and pilot options to improve the Service Complaints system so there is a clear pathway to resolve issues at the lowest, most appropriate level. They are also developing a new landing page with enhanced signposting to help complainants identify the most appropriate route to address their grievance. They will continue to work closely with the Services in 2025 to develop the relevant communications materials, create new bitesize instructional videos, and make the necessary amendments to the Service Complaint form.

Recommendation 1.10, made in 2016, remains the longest open recommendation. In September 2024, the Army took a tri-Service lead to determine the root causes of the overrepresentation of female and ethnic minorities personnel in the Service Complaints system. A review of cases submitted by female and ethnic minorities Service personnel was undertaken to make recommendations to improve their experience of the system – the review concluded in November 2024.

Work will continue in 2025 to finalise a delivery plan to ensure each Service looks at the deliverability of the recommendations made, and whether this needs to be done centrally or locally within each Service. The Ministry of Defence is committed to conducting a similar study bi-annually to enable continuous improvements, and to understand how we can support individuals through the Service Complaints system.

As at 31 December 2024, the progress with recommendations was:

Report year	Number of recommendations	Overdue	In progress	Completed	Rejected
2023	No recommendations made				
2022	5	0	1	3	1
2021	4	0	2	2	0
2020	No recommendations made				
2019	4	1	0	3	0
2018	9	0	0	9	0
2017	10	0	0	6	4
2016	12	1	0	11	0
Current standing	44	2	3	34	5

Further detail on the progression of all remaining open recommendations can be found in [Appendix B](#)¹¹.

¹¹ [Appendix B](#) lists those recommendations that were completed in 2024, in addition to recommendations which remain overdue, in progress and rejected as at 31 December 2024.

New recommendations

The Ombudsman has made two new recommendations for her 2024 Annual Report, and one observation:

Recommendation 9.1 – that the Ministry of Defence agrees to adopt a suite of supplementary KPIs, designed by SCOAF, to provide a more comprehensive overview of measurable performance metrics within the system. The overarching timeliness KPI is to remain in place. However, the supplementary KPIs are to be designed and owned by SCOAF, in collaboration and discussion with the Ministry of Defence and the Services. To be completed by January 2026.

Recommendation 9.2 – that the Ministry of Defence works with SCOAF and the Services to develop an agreed, formal process for dealing with mass complaints, to include guidance as to what constitutes a mass complaint, and the situations in which deviation from existing Service Complaint policy is anticipated. To be completed by January 2026.

Observation:

The inability of respondents to approach the Ombudsman and highlight issues about the way they are treated or the way the complaint is investigated represents an injustice, which materially affects the welfare of Service personnel. It would be beneficial for SCOAF to be able to formally receive feedback from respondents, in order to provide a more robust view of the performance of the system.

It should also be noted that the Armed Forces Commissioner, who will be in post from 2026, is empowered to look into any such issues as they consider relevant to the welfare of Service personnel. The Commissioner would therefore be able to take this work forward under their legislative remit, should they choose to do so.

Appendix A – Note on the KPI change

From 2016 onwards, both SCOAF and the Services have calculated the timeliness KPI based on Service Complaints which have been received in-year, and whether or not these were closed by 24 weeks. This methodology means that a number of cases are not captured in KPI calculations – for example, those received after mid-July, which are not yet closed by 31 December. These cases may be closed before or after 24 weeks. However, this information is not known when the reporting period closes.

Following discussions with the Ministry of Defence and the Services, it was agreed that a new method of reporting the KPI would be adopted. The new measure assesses all cases closed in-year, and whether or not these had passed 24 weeks at the point of closure. The new measure provides a number of benefits:

- Provides SCOAF a full year of data
- Provides more accurate oversight of progress against ambition of meeting the KPI
- Removes discrepancies between SCOAF and the Ministry of Defence figures later in-year
- Aligns with standard reporting practice across other organisations

However, the introduction of a new calculation method for the KPI brings with it a number of issues:

- Results in double reporting of (some) cases in the first year(s)
- Causes issues in comparing performance with previous years
- May give the false impression performance has dropped

For this reason, SCOAF intends to report both figures for an initial two to three year period. This will enable direct comparison with previous years' performance, whilst simultaneously laying the groundwork for reporting solely against the new measure in future years.

Throughout this report, the following references have been adopted:

- Old KPI: refers to method of calculation from 2016–2023
- New KPI: refers to method of calculation from 2024 onwards

Appendix B – Progress report of previous recommendations

In line with **recommendation 3.9**,¹² the Ministry of Defence provides regular updates on progress against the recommendations, which have been published below.

Recommendations have been colour-coded and grouped.

	<p>Overdue Work is overdue for implementation</p>		<p>Completed in 2024 No longer reported against, reviewed regularly for compliance</p>
	<p>In progress Reported against until completed</p>		<p>Rejected The recommendation has been rejected by the Ministry of Defence or the single Services</p>

¹² **Recommendation 3.9** – [Annual Report 2018](#), which invited the Ministry of Defence and SCOAF to agree on the frequency of providing updates on open recommendations.

STATUS: OVERDUE**1.10 Original recommendation from Annual Report 2016. Target 2018**

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 ethnic minorities 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.

Update:

In September 2024, the Army assumed a tri-Service leadership role in conducting a comprehensive review of cases submitted by Women and Ethnic Minorities (EM) with the aim of enhancing their overall experience within the system. This review was completed in November 2024. Findings and recommendations stemming from the review underscored the significance of fractured human relationships as the primary issue across the majority of Service Complaints examined, rather than problems specific to particular cohorts. The report ultimately highlighted that the key to enhancing the experiences of female and EM Service Personnel lies in prioritising relationship improvement, which necessitates qualities of compassion and humility.

Moving forward into 2025, the Service Complaints Transformation Team will collaborate closely with the Services to finalise a detailed implementation plan and determine whether actions should be coordinated centrally or at a local level within each Service. Furthermore, similar studies will be conducted biannually to facilitate ongoing enhancements and to gain insights into how individuals can receive support throughout the Service Complaints system.

The Ombudsman welcomes the delivery plan, which must set timelines for appropriate support systems to be put in place, paying particular attention to the recommendations made in previous studies to address this long-standing and significant issue.

STATUS: OVERDUE**4.2 Original recommendation from Annual Report 2019. Target: not specified**

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:

- 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?

Update:

The new Service Complaints Case Management System (CMS) is still evolving but was built to ensure data was at the heart of the system. It will continue to evolve through user feedback, and currently there is both internal reporting for standard users and external data capability for statistic leads. It delivers a new level of granularity in data. The single Services are now able to see more data and have easier access to it. MOD is committed to increasing qualitative data around the customer satisfaction of the system and a customer survey is being explored as well as a data strategy for continuous improvement of the system. The RAF currently have a survey that is being reviewed by Occupational Psychiatry (Occ Psy) leads, which MOD is keen to utilise as part of this initial phase of work. MOD aims to take this through single Service Occ Psy and protocol for official surveys, this work may therefore take up to 6 months to be approved but is a key priority for 2025.

Early challenges with the CMS have impacted functional outputs for the single Service users and with these additional initiatives, however, the Ombudsman hopes to close this recommendation in 2025.

STATUS: IN PROGRESS**6.1 Original recommendation from Annual Report 2021. Target: not specified**

The Ministry of Defence engages with SCOAF in order to amend JSP 831, particularly the Annex F: Service Complaints form, to ensure a consistent approach in the recording of all grievances.

Update:

JSP 831 has undergone minor amendments only, mainly to include changes to move onto a new standardised template. **Recommendation 6.3** provides more detail on the changes to the Annex F to: make it more user friendly; allow an individual to flag their interest in locally resolving their issue; and increase the quality of information shared with the CAT. JSP 831 will be amended to reflect the new process.

Whilst local adaptations can be made to interpret the policy, there must be a mandated adherence to JSP 831 across the Services to prevent disadvantage to personnel across the three arms of Defence.

STATUS: IN PROGRESS**6.3 Original recommendation from Annual Report 2021. Target: not specified**

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 (STT) process, allowing them to be streamed to the most appropriate method of resolution.

Update:

The Conduct, Justice and Equity, Service Complaints and Behaviours Team held workshops with the single Services to discuss and pilot options to provide a clear pathway streamed to the most appropriate method of resolution, this included an option to resolve issues at the lowest level locally.

Local resolution route is not to discourage complainants from submitting a complaint, but to provide clear direction to addressing grievances and allocate the appropriate support.

Extensive research into global Defence organisations was conducted which highlighted the need for a separate timeline for informal grievances to avoid affecting formal complaints admissibility timelines.

This research was shared with the Services, with the Army taking the lead to test a local resolution route. Local resolution could effectively triage between lower-level grievances and more serious Service Complaints; increase resolution rates; drive down formal Service Complaint volumes; reduce delays; and re-empower Commanding Officers, where appropriate, to resolve issues within their command. Crucially, it has the ability to fundamentally improve the grievance system for all personnel.

All three Services agreed on design requirements which will be developed further and introduced by end of August 2025.

The Ombudsman is very encouraged at the work undertaken on this recommendation which demonstrates significant progress in improving the efficiency and effectiveness of our Service Complaints system. The Ombudsman looks forward to seeing the process in action affording Service personnel access to a route for informal resolution and hopes this will be completed in 2025.

STATUS: IN PROGRESS**7.1 Original recommendation from Annual Report 2022. Target: not specified**

That the Ministry of Defence, in collaboration with the Ombudsman and the Services, commits to reviewing case handling processes with a view to achieving standardisation and professionalisation across the Services. This may include considering the nature and volume of roles involved in staffing and supporting the system. For a system that: resolves complaints within allocated timeframes and without undue delay; operates to keep up with demand; people have confidence in; is flexible and proportional.

Update:

The new Service Complaints Case Management System (CMS) has been designed to ensure there is standardisation of activities when handling Service Complaints. Furthermore, and as part of the Service Complaints review, the Service Complaints Transformation Team is committed to exploring standardisation through regular workshops between the Services and SCOAF. The first session in November 2024 looked at identifying where working practices might be aligned and best practice can be shared. The MOD is committed to continue engaging in these workshops as part of its continuous improvement activities.

In 2025, the Service Complaints Transformation Team will continue to progress this recommendation. Further work will include reviewing the alignment between the civilian and military processes, looking at where best practice can be learned from MOD's complaints systems. The Service Complaints & Behaviours team and Civilian HR team will also be developing policy direction to provide further clarity around the handling of complaints involving both civilian and military respondents within both systems.

The Ombudsman has noted the level of collaboration and commitment to reach this stage and hopes to close this recommendation in 2025.

STATUS: COMPLETED 2024**7.3 Original recommendation from Annual Report 2022. Target: not specified**

That the Ministry of Defence, in collaboration with SCOAF and in consultation with the Services, establishes a formal process of quality review allowing for oversight and dip sampling to be provided by SCOAF.

Update:

A Service Complaints Assurance Framework was agreed in October 2024. The framework sets out the requirement for each of the single Services to have in place their own internal quality assurance framework to ensure the handling of Service Complaints meets the expected standard in terms of supporting the aims and principles of the system, and a process for 'dip sampling' that enables SCOAF to undertake periodic reviews of a defined number of cases from each of the Services.

The first round of 'dip sampling' commenced at the end of November 2024, with the Services providing SCOAF with details of those cases reviewed as part of their own internal quality assurance processes. SCOAF subsequently undertook and completed their review of the cases, providing the Services with the results of the reviews on 19 December 2024.

This recommendation is now closed but will remain under review.

STATUS: COMPLETED 2024**7.4 Original recommendation from Annual Report 2022. Target: not specified**

That the Ministry of Defence and the Ombudsman agree a standard operating procedure to ensure that when changes are made and/or recommendations are carried out, the purpose and intended effect of these changes is captured and understood. This should also include a process for reviewing the impact of any changes introduced, whether prompted by the Service Complaints Transformation Team or by SCOAF recommendations.

Update:

Initial scoping was undertaken between SCOAF and the Service Complaints Transformation Team. Following completion of the scoping exercise, the Service Complaints Transformation Team produced a tool with the aim to capture, measure, and review key changes made to the Service Complaints process. This tool is accessible to SCOAF and will be reviewed internally by the Service Complaints Transformation Team, with meetings scheduled bi-annually with SCOAF. These bi-annual meetings have been scheduled for the 16 April and 15 October 2025.

This recommendation now forms part of business as usual.

STATUS: REJECTED**2.3 Original recommendation from Annual Report 2017.****Target: 31 December 2018**

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.

Remains rejected – under review**STATUS: REJECTED****2.4 Original recommendation from Annual Report 2017. Target: 30 April 2019**

That by April 2019, training is available to personnel involved in making decisions as part of the Service Complaints system, including Specified Officers, Decision Bodies, Appeal Bodies, on decision writing for complaints handlers. This could be discreet training or part of a wider package.

Remains rejected – under review**STATUS: REJECTED****2.7 Original recommendation from Annual Report 2017. Target: 30 April 2019**

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 is developed and implemented tri-Service.

Remains rejected – under review

STATUS: REJECTED**2.8 Original recommendation from Annual Report 2017. Target: 30 April 2019**

That by April 2019, the Ministry of Defence reviews 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.

Remains rejected – under review

STATUS: REJECTED**7.5 Original recommendation from Annual Report 2022. Target: not specified**

That the Ministry of Defence seeks to amend the allowable grounds of appeal to include material error of reasoning, and to require individuals to exhaust the appeals process before their complaint is considered ‘finally determined’.

Remains rejected – under review

Appendix C – Governance

Details of SCOAF key governance documents have been provided below. These documents provide an insight into how SCOAF works and the standards to which it sets itself.

<p>SCOAF Business Plan</p>	<p>SCOAF’s Business Plan provides information on agreed objectives, staffing and finance.</p> <p>SCOAF Business Plan</p>
<p>Ombudsman Association (OA) Service Standards Framework</p>	<p>The OA is the professional association for Ombuds Institutions and complaint handlers in the UK, Ireland and the overseas dependencies/territories. The Service Standards Framework sets out what is considered to be good practice in the provision of fair and efficient complaint handling. SCOAF has adopted this framework and will report against it annually.</p> <p>This year’s assessment, alongside a copy of the OA Service Standards Framework, can be found via the link below:</p> <p>OA Service Standards Framework</p>
<p>Governance Framework Agreement</p>	<p>This framework document has been agreed between SCOAF and the Ministry of Defence, and sets out the broad governance framework within which SCOAF and the Ministry of Defence operate. The document was published in October 2023.</p> <p>Governance Framework Agreement</p>

Appendix D – 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 His Majesty's Treasury and the Ministry of Defence in the commitment of its financial resources.

Financial expenditure by SCOAF 2024

Category	Spend
Staff costs	£1,370,220
Accommodation and office running costs (including IT and office machinery)	£458,954
Training and professional membership fees	£10,110
Independent legal advice	£83,017
Travel and subsistence	£8,144
Total	£1,930,445

Appendix E – Events, visits and external appointments

The table below lists all the official events attended by the Ombudsman in 2024. This does not include regularly scheduled meetings held with the Service Chiefs and PPOs.

Date	Event type	Event	Location
January			
18 January	Meeting	Army Families Federation	MS Teams
24 January	Visit	Royal Logistics Corps	St David's Barracks, Bicester
30 January	Visit	Defence Medical Academy	MS Teams
31 January	Presentation	Army Generalship Programme	Royal Military Academy, Sandhurst
February			
1 February	Presentation	Naval Commanding and Executive Officer Designate Course (COXODC)	MS Teams
7 February	Presentation	Behaviour and Discipline in the Uniformed Services: BTEC students	Stratford College, West Midlands
22 February	Meeting	Service Complaints Quarterly Collaborative	SCOAF Office, London
26 February	Visit	Defence School of Policing and Guarding	Southwick Park, Fareham
27 February	Presentation	Army Commanding Officer Designate Course (CODC)	MS Teams
28–29 February	Visit	Army Personnel Centre	Glasgow, Scotland
March			
5 March	Meeting	OA Board Meeting	London
14 March	Presentation	RAF Future Commander Study Period	MS Teams

Date	Event type	Event	Location
April			
9 April	Meeting	Navy Legal Meeting	MS Teams
16 April	Meeting	International Conference of Ombudsman for Armed Forces	MS Teams
16 April	Meeting	OA Legal Network Meeting	MS Teams
17 April	Meeting	Equality and Human Rights Commission (EHRC) Meeting	SCOAF Office, London
18 April	Visit	1 Military Working Dogs	North Luffenham, Rutland
19 April	Meeting	External Oversight Body of the (Irish) Defence Forces	Dublin, Ireland
24 April	Presentation	COXODC	MS Teams
25 April	Visit	RAF Benson	Wallingford, Oxfordshire
May			
1 May	Meeting	RAF Legal Meeting	MS Teams
8 May	Meeting	Army Legal Meeting	MS Teams
16 May	Meeting	Association of Chief Executives: Improving Public Trust Through Routine Regulatory Scrutiny	MS Teams
21 May	Conference	SCOAF Stakeholder Symposium	Broadway House, London
21 May	Meeting	OA Board Meeting	MS Teams
22 May	Meeting	Service Complaints Quarterly Collaborative	RAF High Wycombe
29 May	Conference	Army VeRR Decision Bodies Training Conference	Andover, Hampshire
29 May	Meeting	OA Legal Network Meeting	MS Teams

Date	Event type	Event	Location
June			
5 June	Presentation	Commando Forces Service Women's Event	Commando Training Centre, Lympstone
10–11 June	Visit	The Infantry Battle School	Brecon, Wales
11–13 June	Conference	OA Conference	Bristol
18 June	Conference	Army VeRR Decision Bodies Training Conference	Andover, Hampshire
21 June	Presentation	CODC: Service Complaints Oversight	MS Teams
24 June	Visit	Royal Electrical and Mechanical Engineers Headquarters (8 Training/5 Force Support Battalions)	Lyneham, Wiltshire
July			
17 July	Meeting	OA Working Group: MP Engagement	MS Teams
22 July	Meeting	Complaints in Defence – Meeting with Chair of Defence People Committee	MS Teams
24 July	Visit	Churchill Lines	MOD St Athan
25 July	Meeting	Reaffirming Our Standards: July External Challenge Panel	MOD Main Building, London
29 July	Meeting	Uniformed Services Roundtable: Regulators, Inspectorates and Ombudsman	EHRC Office, London
August			
12 August	Visit	Defence Academy	Shrivenham, Oxfordshire

Date	Event type	Event	Location
September			
2–5 September	Visit	British Army Training Unit Kenya	Kenya
10 September	Meeting	Minister for Armed Forces, Mr Luke Pollard MP	MOD Main Building, London
10 September	Meeting	OA Working Group: MP Engagement	MS Teams
11 September	Presentation	Top Flight Programme Dinner	London
18–20 September	Presentation	International Society for Military Law and the Law of War Conference	Bruges, Belgium
24 September	Presentation	CODC: Service Complaints Oversight	MS Teams
24 September	Meeting	OA Board Meeting and Company Annual General Meeting	MS Teams
25 September	Meeting	Service Complaints Quarterly Collaborative	HMS Excellence, Portsmouth
26 September	Visit	King's Troop, Royal Horse Artillery	Woolwich, London
30 September-2 October	Conference	International Conference of Ombudsman for Armed Forces	Berlin, Germany
October			
3 October	Presentation	COXODC	MS Teams
10 October	Meeting	OA Annual General Meeting 2024	MS Teams
30 October	Meeting	Army Legal Meeting	MS Teams

Date	Event type	Event	Location
November			
6 November	Conference	RAF Service Complaints Conference	MS Teams
6 November	Meeting	OA Validation Committee Meeting	MS Teams
7 November	Visit	EHRC Equality Exchange for Uniformed Services: Preventing and Tackling Workplace Sexual Harassment	MS Teams
8 November	Meeting	Service Complaints Quarterly Collaborative	Andover, Hampshire
9 November	Event	Festival of Remembrance 2024 (The Royal British Legion)	London
13 November	Meeting	Army Legal Team	MS Teams
22 November	Workshop	Tri-Service Collaborative Workshop	SCOAF Office, London
27 November	Presentation	Executive Committee Army Board	Andover, Hampshire
December			
3 December	Meeting	OA Board Meeting	London
3 December	Meeting	House of Commons Defence Committee, Meeting with Chair	Portcullis House, London
4 December	Presentation	Training Session for Army SCT	Andover, Hampshire
5 December	Visit	38 Irish Brigade	Belfast, Northern Ireland
10 December	Committee	Public Bill Committee, Oral Evidence	Portcullis House, London
13 December	Meeting	Navy Legal Meeting	MS Teams

Appendix F – Tri-Service statistical factsheet

Key findings

Timeliness

- 64% of Service Complaints received and closed in 2024 (old KPI) and 63% of Service Complaints closed in 2024 (new KPI) were decided within the 24-week target. The target was 90%.
- The average time taken to close a Service Complaint was 22 weeks.
- Bullying, harassment and discrimination Service Complaints take the longest – 27 weeks.
- As at 31 December 2024, there were 638 Service Complaints open, of which 31% were still open beyond the 24-week target and not suspended or stayed.

Volume

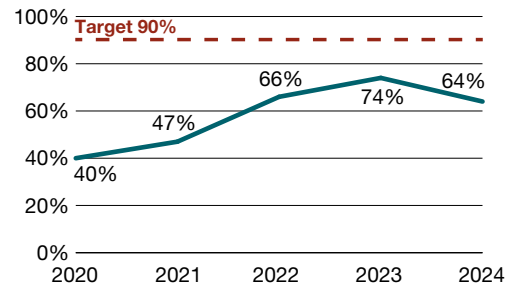
- In 2024, 1,302 Service Complaints were ruled admissible.
- This represented 83% of Service Complaint applications.
- 42% of Service Complaints closed in 2024 were decided as fully/partially upheld and 44% as not upheld.
- 19% of Decision Body decisions were appealed.

Bullying, harassment and discrimination*

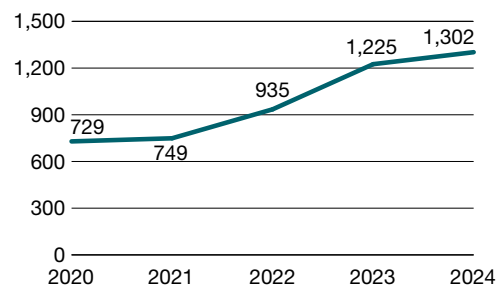
- 12% of Service personnel say they experienced bullying, harassment and discrimination.
- Of those, 13% said they raised a written complaint.

* Source: AFCAS 2024

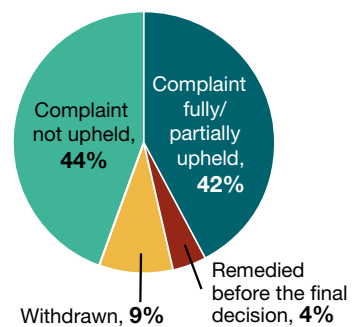
Service Complaint in-year timeliness rate (old KPI), 2020-2024



Annual number of Service Complaints ruled admissible, 2020-2024



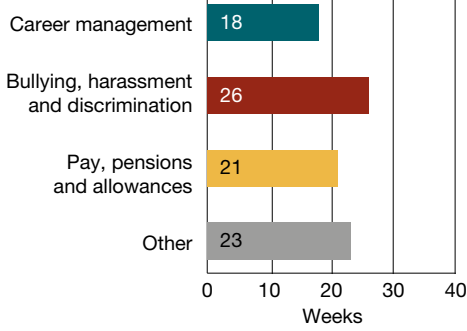
Outcomes of Service Complaints closed in 2024¹³



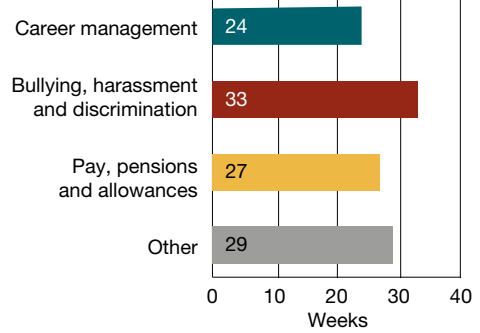
Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints resolved early	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Tri-Service	71	17%	4%	42%	19%	22 weeks

13 Figures may not add up to 100% due to rounding

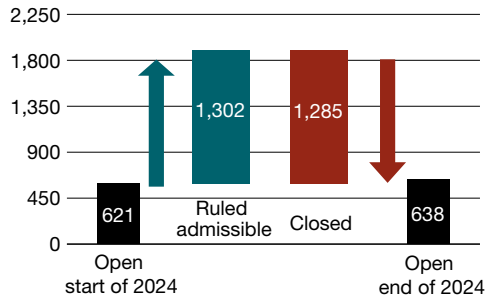
Time taken to close Service Complaints by complaint category, 2024



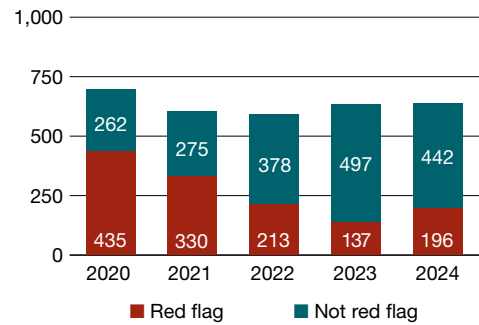
Time taken to close Service Complaints (appealed) by complaint category, 2024



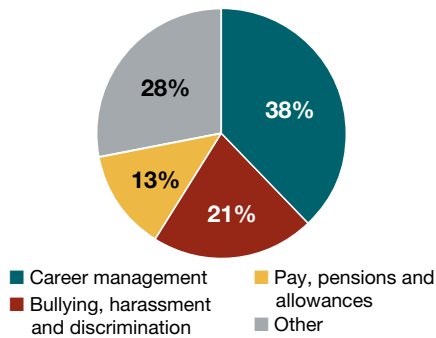
Number of Service Complaints: ruled admissible and closed in 2024; open at start and end of 2024



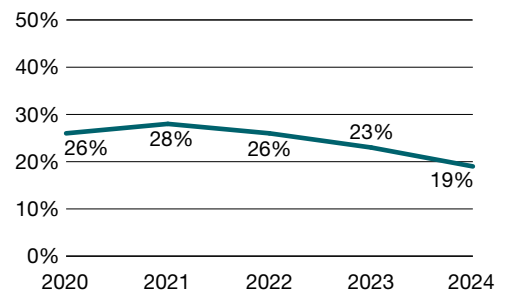
Number of open Service Complaints by red flag status, 2020-2024



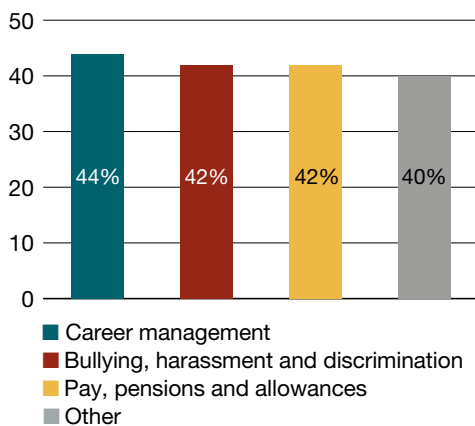
Category of Service Complaints ruled admissible in 2024



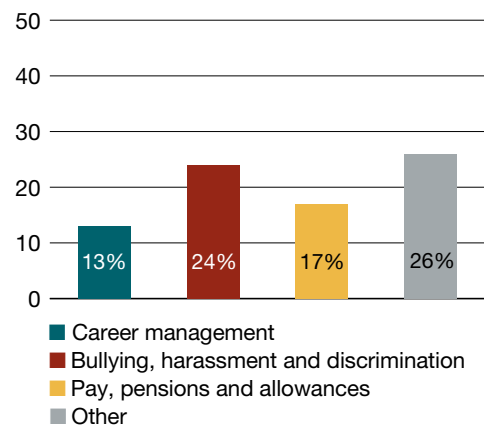
Service Complaint appeals sought rate, 2020-2024



Service Complaint upheld rate by category, 2024



Service Complaint appeals rate by category, 2024



Appendix G – Single Service statistical factsheets

Royal Navy – Key findings

Timeliness

- 61% of Service Complaints received and closed in 2024 (old KPI) and 61% of Service Complaints closed in 2024 (new KPI) were decided within the 24-week target. The target was 90%.
- The average time taken to close a Service Complaint was 23 weeks.
- Bullying, harassment and discrimination Service Complaints take the longest – 36 weeks.
- As at 31 December 2024, there were 164 Service Complaints open, of which 36% were still open beyond the 24-week target and not suspended or stayed.

Volume

- In 2024, 310 Service Complaints were ruled admissible.
- This represented 94% of Service Complaint applications.
- 45% of Service Complaints closed in 2024 were decided as fully/partially upheld and 42% as not upheld.
- 21% of Decision Body decisions were appealed.

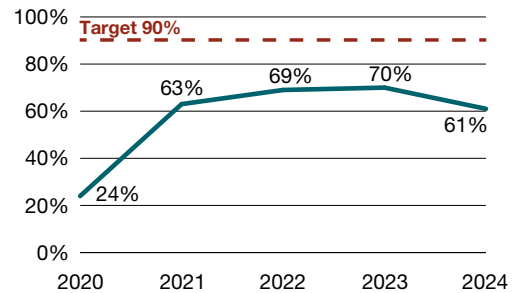
Bullying, harassment and discrimination*

- 15% of Royal Navy† personnel say they experienced bullying, harassment and discrimination.
- Of those, 12% said they raised a written complaint.
- 5% of Royal Marine personnel say they experienced bullying, harassment and discrimination.
- Of those, 10% said they raised a written complaint.

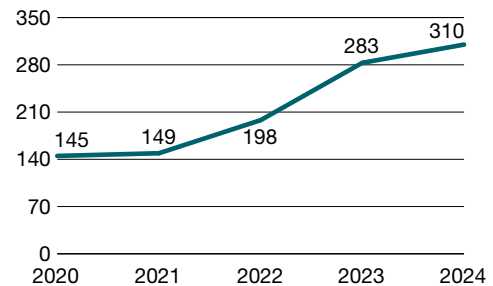
* Source: AFCAS 2024

† Excluding Royal Marines

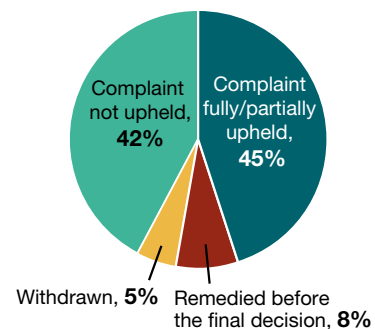
Service Complaint in-year timeliness rate (old KPI), 2020-2024



Annual number of Service Complaints ruled admissible, 2020-2024

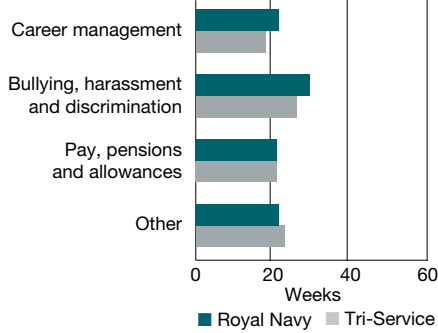


Outcomes of Service Complaints closed in 2024

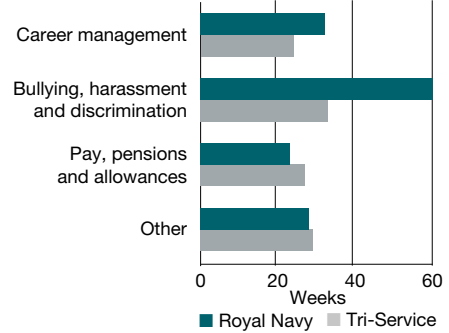


Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints resolved early	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Royal Navy	82	6%	8%	45%	21%	23 Weeks
Tri-Service	71	17%	4%	42%	19%	22 Weeks

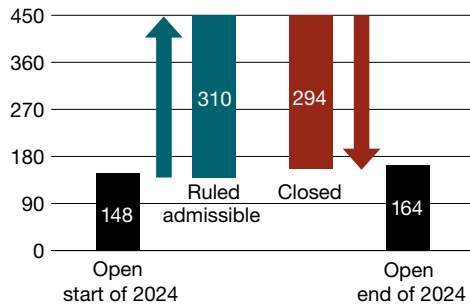
Time taken to close Service Complaints (no appeal) by complaint category, 2024



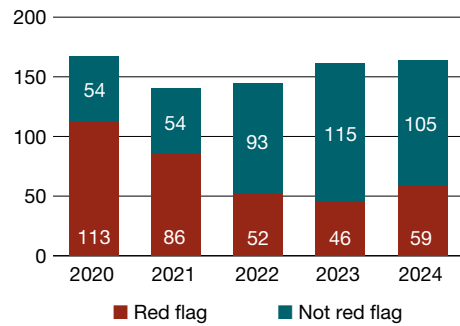
Time taken to close Service Complaints (appealed) by complaint category, 2024



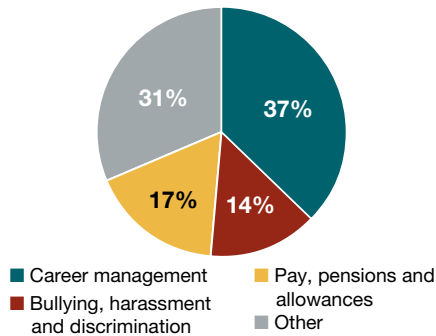
Number of Service Complaints: ruled admissible and closed in 2024; open at start and end of 2024



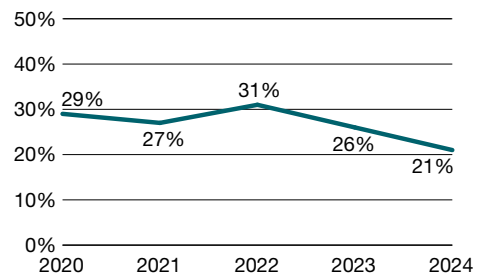
Number of open Service Complaints by red flag status, 2020-2024



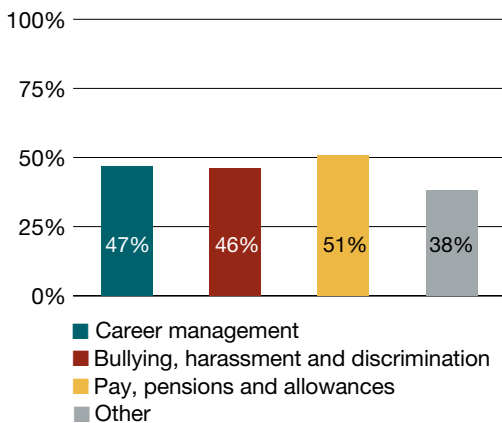
Category of Service Complaints ruled admissible in 2024¹⁴



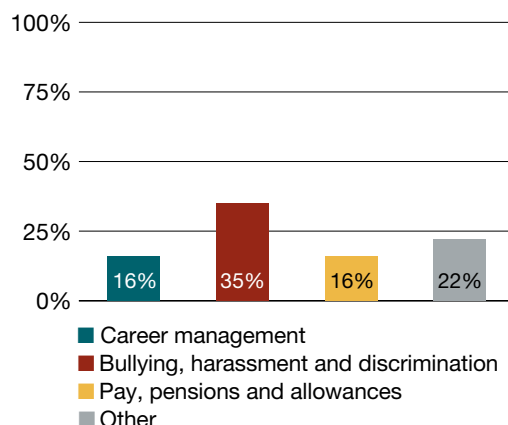
Service Complaint appeals sought rate, 2020-2024



Service Complaint upheld rate by category, 2024



Service Complaint appeals sought rate by category, 2024



¹⁴ Figures may not add up to 100% due to rounding

Army – Key findings

Timeliness

- 72% of Service Complaints received and closed in 2024 (old KPI) and 63% of Service Complaints closed in 2024 (new KPI) were decided within the 24-week target. The target was 90%.
- The average time taken to close a Service Complaint was 22 weeks.
- Bullying, harassment and discrimination Service Complaints take the longest – 24 weeks.
- As at 31 December 2024, there were 300 Service Complaints open, of which 26% were still open beyond the 24-week target and not suspended or stayed.

Volume

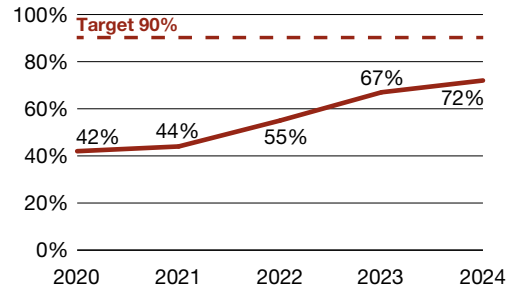
- In 2024, 645 Service Complaints were ruled admissible.
- This represented 76% of Service Complaint applications.
- 44% of Service Complaints closed in 2024 were decided as fully/partially upheld and 41% as not upheld.
- 20% of Decision Body decisions were appealed.

Bullying, harassment and discrimination*

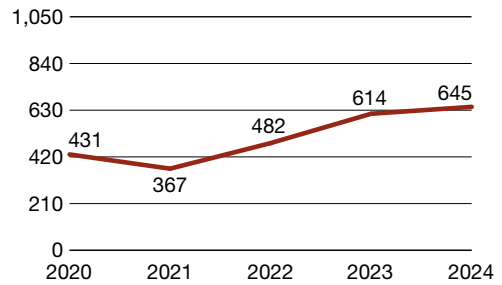
- 11% of Army personnel stated that they had experienced bullying, harassment and discrimination.
- Of those, 13% raised a written complaint.

* Source: AFCAS 2024

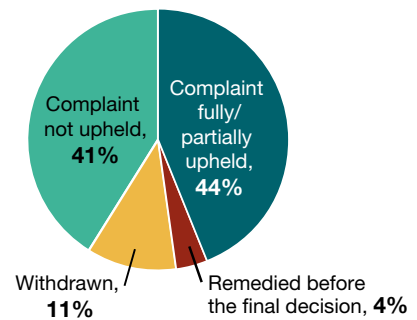
Service Complaint in-year timeliness rate (old KPI), 2020-2024



Annual number of Service Complaints ruled admissible, 2020-2024

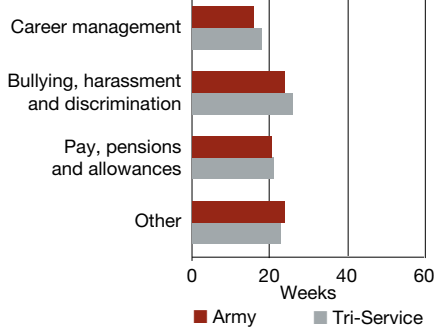


Outcomes of Service Complaints closed in 2024

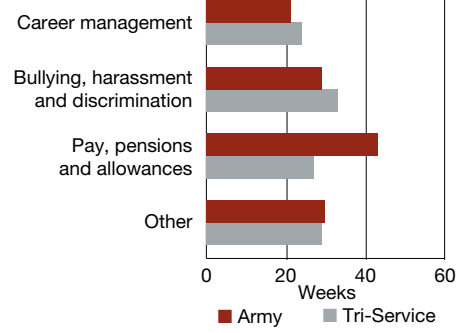


Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints resolved early	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Army	59	24%	4%	44%	20%	22 weeks
Tri-Service	71	17%	4%	42%	19%	22 weeks

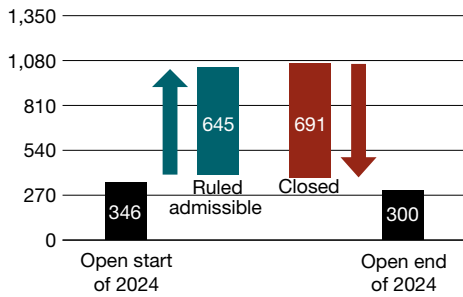
Time taken to close Service Complaints (no appeal) by complaint category, 2024



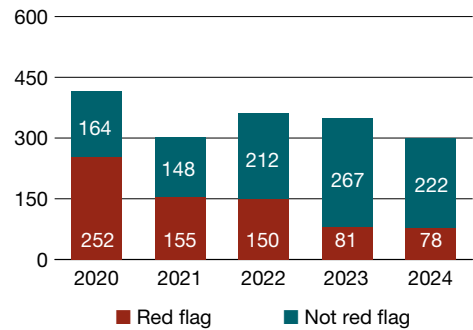
Time taken to close Service Complaints (appealed) by complaint category, 2024



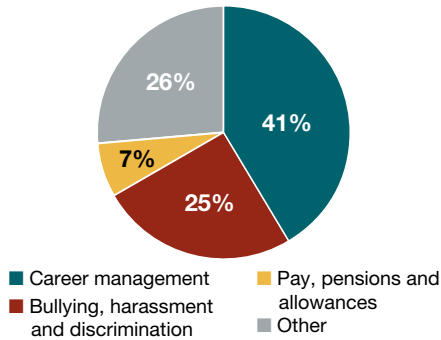
Number of Service Complaints: ruled admissible and closed in 2024; open at start and end of 2024



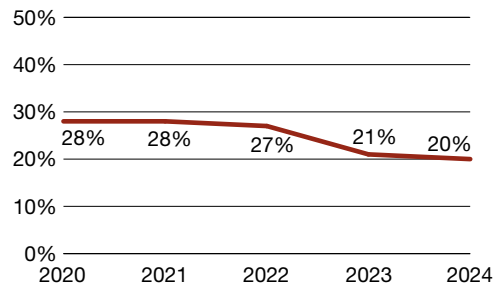
Number of open Service Complaints by red flag status, 2020-2024



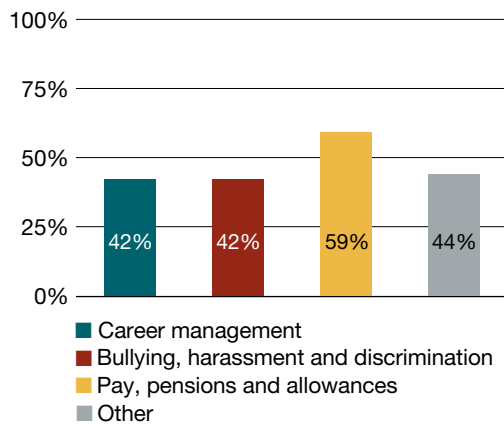
Category of Service Complaints ruled admissible in 2024¹⁵



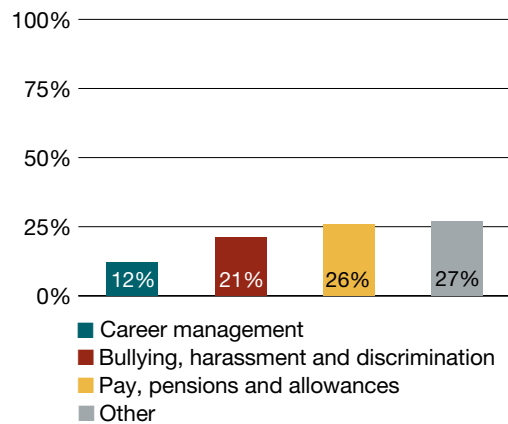
Service Complaint appeals sought rate, 2020-2024



Service Complaint upheld rate by category, 2024



Service Complaint appeals sought rate by category, 2024



¹⁵ Figures may not add up to 100% due to rounding

Royal Air Force – Key findings

Timeliness

- 52% of Service Complaints received and closed in 2024 (old KPI) and 63% of Service Complaints closed in 2024 (new KPI) were decided within the 24-week target. The target was 90%.
- The average time taken to close a Service Complaint was 22 weeks.
- Bullying, harassment and discrimination Service Complaints take the longest – 27 weeks.
- As at 31 December 2024, there were 174 Service Complaints open, of which 34% were still open beyond the 24-week target and not suspended or stayed.

Volume

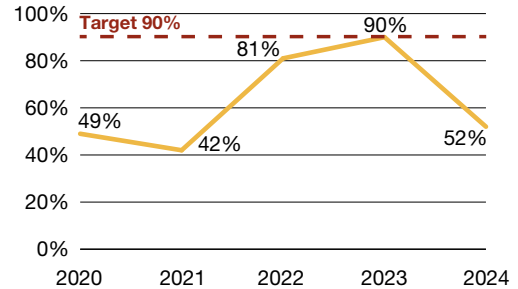
- In 2024, 347 Service Complaints were ruled admissible.
- This represented 91% of Service Complaint applications.
- 36% of Service Complaints closed in 2024 were decided as fully/partially upheld and 55% as not upheld.
- 17% of Decision Body decisions were appealed.

Bullying, harassment and discrimination*

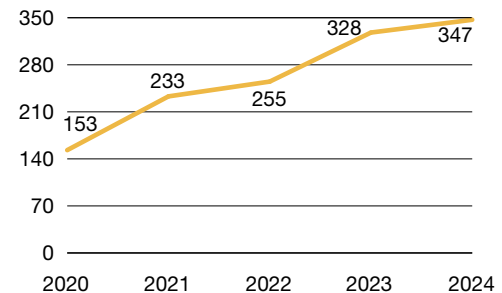
- 12% of RAF personnel experienced bullying, harassment and discrimination.
- Of those, 12% raised a written complaint.

* Source: AFCAS 2024

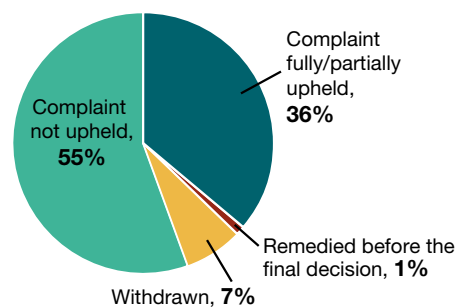
Service Complaint in-year timeliness rate (old KPI), 2020-2024



Annual number of Service Complaints ruled admissible, 2020-2024



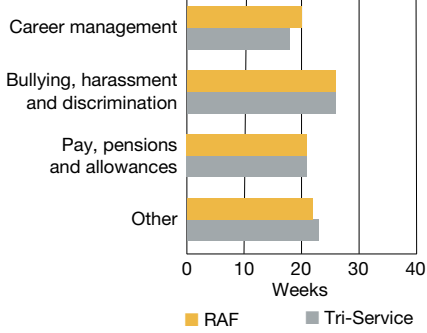
Outcomes of Service Complaints closed in 2024¹⁶



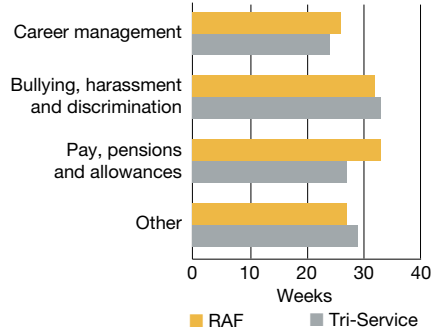
Service	Service Complaints per 10,000 Service personnel	Proportion of statements of complaint ruled inadmissible	Proportion of Service Complaints resolved early	Proportion of Service Complaints upheld	Proportion of Decision Body decisions appealed	Time taken to close a Service Complaint
Royal Air Force	99	9%	1%	36%	17%	22 weeks
Tri-Service	71	17%	4%	42%	19%	22 weeks

16 Figures may not add up to 100% due to rounding

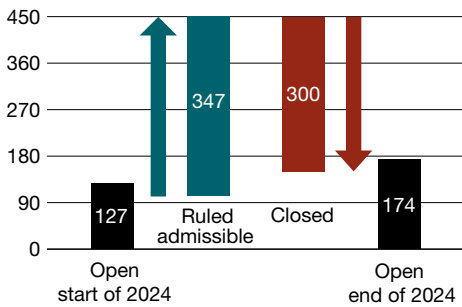
Time taken to close Service Complaints (no appeal) by complaint category, 2024



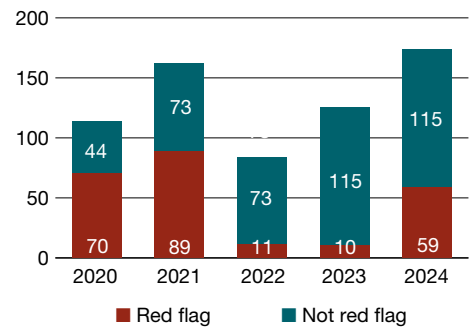
Time taken to close Service Complaints (appealed) by complaint category, 2024



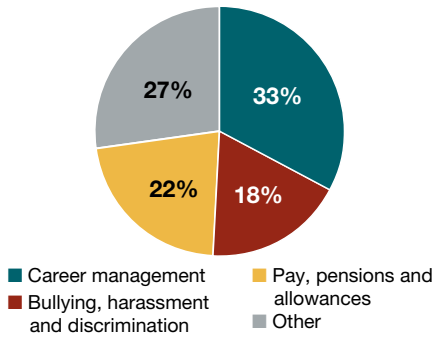
Number of Service Complaints: ruled admissible and closed in 2024; open at start and end of 2024



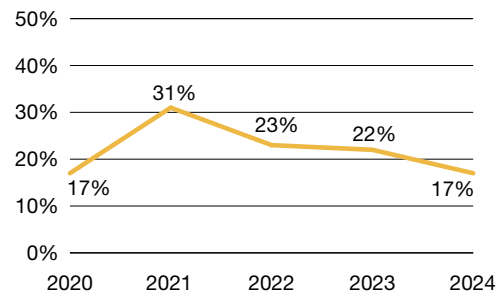
Number of open Service Complaints by red flag status, 2020-2024



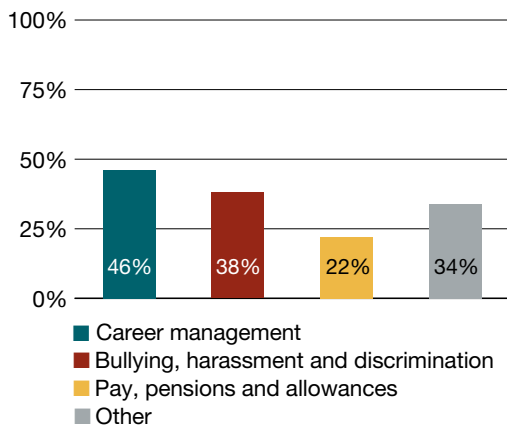
Category of Service Complaints ruled admissible in 2024



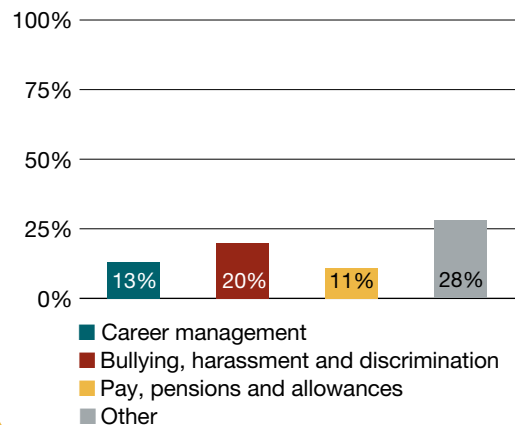
Service Complaint appeals sought rate, 2020-2024



Service Complaint upheld rate by category, 2024



Service Complaint appeals sought rate by category, 2024



Appendix H – Single Service narratives

Royal Navy narrative



Second Sea Lord

NAVY COMMAND

Navy Command Headquarters
MP 2-1, Leach Building
Whale Island, PORTSMOUTH
Hampshire, PO2 8BY

Mariette Hughes
Service Complaints Ombudsman for the Armed Forces 26 February 2025

Dear Mariette,

END OF YEAR REPORT FROM THE SECOND SEA LORD TO THE SERVICE COMPLAINTS OMBUDSMAN FOR THE ARMED FORCES.

For the fifth successive year the Royal Navy has received, admitted and decided a greater number of Service Complaints than in the previous year. During 2024, a total of 331 Statements of Complaints received admissibility decisions of which 310 were admitted and 294 were decided. The average time taken to resolve a Service Complaint in 2024 was 23 weeks compared to 25 weeks in 2023.

In addition to these complaints, a further 604 were admitted in respect of a class action challenging aspects of the MOD's accommodation policy. These complaints are, as you know, being handled under a separate process, but they did, nevertheless, require full scrutiny and admissibility decisions. A further 90 statements of complaint were received, but where the Central Admissibility Team was able to facilitate informal resolution prior to an admissibility decision. In 2024, therefore, the Royal Navy Central Admissibility Team (CAT) issued admissibility decisions or resolved 1025 Statements of Complaint.

The average time taken to resolve a complaint is now 23 weeks and within the KPI metric¹ of 24 weeks. This relates to the 294 complaints which received a formal decision in 2024 of which 181 were determined within 24 weeks. This compares to 2023 when a total of 269 complaints were closed of which 151 were closed within 24 weeks.

The increase in complaints has therefore presented immense challenges for the team, not least of which has been the need to ensure there are adequate resources to deliver timely and effective investigations and decisions. Additional staff were appointed to the team at the end of 2023, but the effect of these increases was largely negated by the impact of the centrally imposed restrictions on recruiting during most of 2024. Following the lifting of controls, I am pleased to say that as at the end of 2024, all posts within the Service Complaints Secretariat had been filled. Further increases have been approved for 2025; we intend to uplift the team by a further 5 VeRRS DBs and an additional 8 staff across the Service Complaints team.

Despite these challenges, I welcome the increased number of complaints as a sign of improving confidence in the system. As you mentioned in your recent session with the House of Commons Defence Committee, Central Admissibility and the My Complaints app have probably been the

¹ The proportion of complaints closed during the year which received a final decision within 24 weeks.



main reason for this but it is also worth reflecting on the measures that have been put into place to improve confidence in the system.

Over the past few years, we have given much thought as to how we might improve the experience of those who are party to the complaints process – much of this through the auspices of the collaborative sessions with yourself and the single Service Secretariats. We have continued to develop our own internal assurance regime, allowing us to scrutinise those complaints which have not been referred to your office. This is enabling us to identify lessons which complement those identified during the investigation of complaints formally referred to SCOAF. In particular, we have introduced measures which have allowed us to improve the way Bullying, Harassment and Discrimination cases are investigated which has enabled us to reduce the average time taken to resolve these complaints from 49 weeks in 2024 to 36 this year. We also have an extensive outreach programme under which members of the Service Complaints team are briefing at a number of key career development courses including CO/XO designates course and several professional development courses.

In addition to the work of the Service Complaints team, the RN Culture and Leadership Team receives copies of all behavioural related decision letters enabling them to act upon the findings and ensure greater coherence and organisational learning across the Whole Force. This has included refinement of targeted education and interventions where necessary.

Through investigations such as Operation Rockland², we have signalled our determination to root out inappropriate behaviour, and underpinned our commitment to making the Royal Navy a place where all can serve and fulfil their potential.

This holistic approach does seem to be showing signs of success – for example whilst we have seen sustained increases in the number of complaints received, the number and proportion of these relating to Bullying, Harassment and Discrimination has reduced for the third successive year from 30% of all complaints in 2022 to 19% in 2023 and 14% in 2024. This is now the lowest at any point over the past 8 years.

Equally, despite the significant increase in the number of complaints, the numbers seeking to refer matters to your office has remained constant. This too, could suggest greater satisfaction with the outcomes.

The number of complaints from women relating to Bullying Harassment or Discrimination has fallen, from 36% of total complaints in 2022 to 26% in 2024, and it is not since 2022 that we have received a complaint relating to racial harassment or discrimination. However, evidence gathered through reviews such as Operation Rockland suggest there are those that have not stepped forward and our engagement with the Service Networks reinforces this view.

We therefore still need to do more to understand why women and ethnic minorities are proportionally more likely to raise a service complaint than their white, male, counterparts. Your “recommendation 1.10” raised this as a concern and the Army has led a review on behalf of the Services to examine this. This concluded that “broken relationships rather than cohort specific issues” were at the heart of most complaints but we will be working with our MOD and Service Colleagues to develop this work in 2025.

I am keen to ensure that complaints are dealt with at the lowest appropriate level, so as much as I welcome the fact that people seem to be more confident about raising formal complaints, I am

² The systematic investigation and resultant actions following the allegations of unacceptable sexual behaviour in the Submarine Service commenced in 2022 and completed in 2024.



concerned that a significant proportion of these complaints might have been addressed faster, and more appropriately through other less formal means including using the Divisional and Troop Commander's system that sits at the heart of our leadership function. During 2024, we made formal admissibility decisions on 331 Statements of Complaint, but the Central Admissibility Team also received a further 90 complaints which they were able to support the complainant to achieve informal resolution. In addition to this, ongoing work after admissibility enabled the RN to resolve a further 39 Service Complaints without the need for a formal decision.

I was pleased to see that you reflected on this with the HCDC and I know that my team is working with you, MOD, and single Service Colleagues to examine how we might strike a better balance between enabling people to have ready access to, and confidence in the formal complaints process, whilst ensuring matters are resolved at the lowest possible level.

Referrals to SCOAF

During 2024 the RN worked on 458 Service complaints of which 75 resulted in a referral of one kind or another to your office. A further 4 matters were referred relating to "Service Matters". Of these, 30 referred to admissibility decisions, of which one was overturned, there were 18 applications for undue delay of which 12 were upheld and 27 applications requesting a review of the decision, or complaining of maladministration in the management of their complaint of which 3 of these resulted in maladministration being either partially or fully upheld and 3 resulted in formal decision upholding or partially upholding the substance of the complaint.

Finally, I should like to thank you personally for the pragmatic and constructive approach you have adopted throughout your tenure and for your willingness to engage as we seek to improve the Service Complaints process. My Service Complaints team have particularly welcomed the ability to engage with you through the collaborative sessions with our single Service colleagues and 1SL and I have particularly appreciated the collegiate, frank, and extremely helpful one to one meetings we have had this year.



**Vice Admiral Sir Martin Connell KCB CBE
Second Sea Lord**



Army narrative

Lieutenant General David Eastman MBE
Deputy Chief of the General Staff

Army Headquarters
Marlborough Lines
Monxton Road
ANDOVER
SP11 8HJ



18 Feb 25

SERVICE COMPLAINT (SC) PERFORMANCE - 2024 ARMY ANNUAL REPORT NARRATIVE

PERFORMANCE

1. The Army SC Transformation Programme completed in December 2024 and continues to deliver significant improvement. This year the Army achieved a Key Performance Indicator (KPI) of 72% against the mandated KPI of 90% of SCs closed within 24 weeks, a c63% improvement since June 2022. Against the new KPI model the growth profile remains similar, achieving a KPI of 63%, a c70% improvement since December 2021. Career Management (CM) SCs, which made up 41% of SCs in 2024, remain the quickest SCs to resolve; the Army SC CM Team attached to the Army Personnel Centre achieved a KPI of c96%. An indication of the improvement in reducing delay is the marked reduction in Red Flag cases, those that exceed the 24 week KPI, including Legacy cases, those complex SC that last for longer than 12 months. By the end of 2024, there were just 78 Red Flag cases. Of those, 23 were Legacy cases, 44% less than the preceding year. Finally, the Army has achieved the MOD target median of 10 days for making a SC admissibility decision for the first time.

2. Beyond the quantitative improvements in SC transformation, there are also measurable improvements in the quality of decisions being made. The volume of appeals against Initial SC admissibility decisions overturned by your office was down from 4% in 2022 to 0.5% by December 2024. The volumes of SC appeals admitted has been reduced from 100% in 2022 to 19% in 2024; whilst at the same time your office upheld, in favour of the Army, 75 of the last 79 appeal admissibility challenges referred to you. Additionally, the number of applications to you by SC complainants for maladministration in process or errors in determination was reduced from 4% of all Army SC determinations in 2022 to 2% in 2024. Whilst there is still more to do, that we have achieved these outcomes whilst the volume of SCs continues to rise, is indicative of the effectiveness and potential of the current Army SC model, and the continuing commitment of the people who operate it.

3. Pivotal to the transformation programme has been the centralisation and professionalisation of the Army SC process. This approach has also established greater independence in investigation and decision making. 80% of all SCs are now decided on centrally within the Army Service Complaints Secretariat, a complete reversal of where we were two years ago, with all of the remaining 20% of SCs now being decided in a unit other than that within which it occurred. More broadly, and in order to deliver a more coherent approach to wrongdoing, the Army brought those elements that manage SC, Disciplinary and Administrative Action, Service Inquiries and Inquests, Employment Tribunals, and the

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Inclusion Team under a single 1* Head within Army Headquarters. This will enable swifter and more coherent decision making, resolution and enhanced organisational learning.

4. I would like to draw your attention to the following two more detailed observations:
- a. **Volume of Admissible SCs.** We continue to observe a significant increase in the volume of SCs being submitted. 1,158¹ were submitted in 2024, a 42% increase on the preceding 12 months and a 122% increase in the last three years following four years of gentle decrease. This year, however, we also observe a steadying in the growth of those admitted, 645 in 2024, just a 5% increase in the number of those admitted in 2023, albeit a 73% increase since December 2021. This reinforces the notion put forward last year that the principal cause in growth in the volume of SCs submitted was the result of instituting Central Admissibility in June 2022. This removed the Commanding Officer from the process with the attendant impact of reducing opportunities for early informal resolution. We are closely engaged with the MOD and yourself in developing the Local Grievance Resolution model to address this imbalance. The increasing variance between those SCs submitted and those deemed admissible is likely a byproduct of SC Digitalisation and the MyComplaint App, which improves access to the SC process but without perhaps the instructions to guide Service Personnel (SP) in what is and what is not admissible. We are working closely with the MOD in developing your Recommendations 6.1 and 6.3, which should address this.
 - b. **Female and Ethnic Minority (EM) Representation.** We continue to observe increased levels of SC submissions in these two cohorts. Women currently comprise 11.7% of the Regular Army and 15.9% of the Army Reserve, but once again remain overrepresented in the SC system, submitting 22.8% of SC this year. EM SP too remain overrepresented in the SC process, comprising 16.3% of the Army, 6.8% of the Army Reserve, but submitting 19.4% of SCs, the same as last year. Finally, the Army delivered the review into the over-representation of female and EM SP in the SC system, your Recommendation 1.10. on behalf of the MOD. The panel, which included an independent member, reviewed data from all three Services, and we look forward to working with you, the MOD, and our single Service colleagues in taking forward the recommendations from it.

NEXT STEPS

5. There is more to be done. The Army will now focus on two measures that will both consolidate the ground gained thus far and maintain progress. The first is to implement the 2025 Continuous Improvement package, which is now underway. The second is to develop and test the viability of the Army Local Grievance Resolution model. We will continue to work closely with the MOD and our single Service colleagues to deliver this initiative within the wider Departmental SC transformation agenda. From an Army perspective, the three most important elements of the MOD programme are unchanged from last year:
- a. **Local Grievance Resolution.** Three interrelated drivers for growth in SC submissions have been determined: Mechanical (the impact of the execution of policy and process), Behavioural (the behaviour of SP to policy and process), and Environmental (the environment within which SP serve). Analysis identifies the Mechanical element as the principal driver to this increase due to the reduced

¹ These figures do not include the additional 3,483 SC received by the Army in relation to the Over 37 Waiver, which you have directed will be considered separately.

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opportunities for early informal resolution, the result of removing COs from the front end of the process. The appropriate and assured reintroduction of the handling of some low-level complaints by a CO for rapid resolution would allow SP to have their SC heard as they would wish it; introduce the demarcation between lower-level grievances and more serious SCs; drive down formal SC volumes; increase resolution rate; reduce costs; and re-empower COs, where appropriate, to resolve issues within their command. A recent Army study estimates that c67% of SC would be suitable for LGR, with a potential c33% take up rate by Complainants.

b. **Optimise SC Digitalisation.** The MyComplaint App and the SC Case Management System (CMS) became operational this year. They show great potential, but both will require continued attention, investment, and development to deliver their full benefits. I have already addressed the first element (paragraph 4.a.) and the ongoing work by the MOD will address the issues of improved guidance and signposting. As for CMS, implementation was not easy, and it impacted on operations last year. This year the imperative should be to improve the data integrity, data analytical capability, and the user experience, all of which will help unlock its full potential.

c. **SC Research.** As we complete transformation, it is important that we look out further and wider to identify how to optimise our workplace grievance process for our SP. Repeating our comment from last year, this requires the delivery of a research programme that is developed collegiately, resourced appropriately, actively managed, and underpinned by data, to which CMS should be able to add value in due course. We remain committed to contribute to this work.



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Royal Air Force narrative

From: Air Marshal Paul Lloyd CBE MSc MA MDA BEng CEng FIMechE



Deputy Chief of the Air Staff
Headquarters Air Command
Royal Air Force High Wycombe
Buckinghamshire
HP14 4UE

Mrs Mariette Hughes
Service Complaints Ombudsman for the Armed Forces

31 January 2025

SCOAF 2024 ANNUAL REPORT – RAF PERFORMANCE

Thank you once again for affording me the opportunity to contribute to your Annual Report in a year that has seen a continued increase in the number of Service Complaints against a backdrop of challenging workforce levels and the introduction of a number of new Service Complaint applications/systems.

Over the last calendar year, 347 admissible complaints were received. Whilst this was a marginal increase of just 6% on the 328 admissible complaints received in 2023, it represented 36% increase on 2022 (255). Perhaps more telling is the total complaints worked on in 2024 which was 696, which represents a 25% increase in complaints when contrasted with the 557 in 2023¹. Whilst we have no clear barometer to explain the rise in RAF Service Complaints, we believe this growth may suggest an increase in our personnel's confidence in the system and that their grievances will be handled efficiently and fairly. The introduction of the MyComplaint App, and the comparative ease in which complaints may now be submitted, has also been a contributory factor in the overall increase in Service Complaint numbers; we will continue to assess this in the coming year.

In the 2023 Annual Report the RAF achieved their KPI of 90% of complaints resolved within 24 weeks. Whilst we are proud of that achievement, as you and I have discussed, we also recognise that speedy resolution of our Service Complaints must not be at the expense of the quality of the investigation or the decision; a point you also made in your 2023 report. The increase in complaints received by the RAF, attention taken in determining admissibility and a greater focus by the RAF Service Complaints Team (SCT) on conducting in-depth investigations for complex complaints, has led to the RAF KPI decreasing to 63%. Although this figure is disappointing, for most categories of complaint the experience for the majority of complainants is that their complaint will be completed within the KPI², and it is only in the bullying, harassment and discrimination, and discipline categories that the KPI has been exceeded. Furthermore, whilst mathematically speaking our KPI would suggest a downturn in performance, the RAF actually closed 47% more complaints by volume in 2024 than in 2023 and importantly, the RAF closed as many complaints within 24 weeks in 2024 than in 2023. This perhaps suggests a frailty with the KPI mechanism.

¹ The figures referred to in this paragraph do not include the 552 Leigh Day SLA Group Action cases.

² Median for Pay and Pensions KPI is 21 weeks, Career Management 21 weeks, Bullying, Harassment and Discrimination 27 weeks and 'other' 23 weeks.



'...Per Ardua, ad Astra...'

Where complaints resolution has exceeded the KPI, these often represent the most complex complaints involving the number and availability of witnesses, medical issues amongst the parties, and other factors. Our recently generated Conduct and Unacceptable Behaviours Investigation Team may help improve performance in these complex cases. We also continue to refine the Service Complaints journey for our people to ensure we achieve appropriate, fair and timely decisions for our people and run as effective a complaints system as we are able to. We are reassured by appeals data, that the decisions made by our Decision Bodies appear to strike the appropriate balance between speedy and equitable resolution.

The new MyComplaint App enables Service complaints to be submitted with far greater convenience than ever before, which is a good thing overall. However, it has also increased the work required of the RAF Central Acceptance Team, as direct submission through the My Complaint App has often meant that complainants are not discussing their issues with Unit staff prior to submission, thus many complaints are poorly articulated, require re-submission, and often include excluded matters. This has undoubtedly added time and resource demand at the consideration of admissibility stage. Furthermore, direct submission inhibits opportunities for complaints to be dealt with at the lowest level, meaning that informal resolution pathways are being missed. We are considering a number of adjustments that could be made to MyComplaint to hone the workflows within it to try to refine its operation and encourage resolution of complaints and issues at the lowest level, whilst preserving ease of access to the system for our people.

The following relevant actions have also been carried out in the RAF in 2024:

- We have continued to review the RAF Service Complaints process to ensure that all parties within the process are treated fairly and receive support, whether they are Complainants or Respondents. As part of this process RAF SCT conducted a 'Red Team Event' to enable our case managers and Deciding Bodies to review the 'RAF Service Complaints Journey' and make improvements which will lead to the further streamlining our processes and simplification of our literature. RAF SCT is keen to understand the experience of our personnel as they engage with the Service complaints process, and to this end we will be introducing a significantly improved feedback process early in 2025, not only for complainants but for all parties. Our review continues and will see further refinement of our processes into 2025. As part of the review, we shall produce a Service specific RAF SCT Annual Report for 2024 to document our findings and assist us in delivery for the future.
- Noting Career Management and Terms and Conditions of Service complaints continue to represent the highest proportion of our complaints, we have proposed a Special to Type complaints process relating to appraisals and Career Management disputes. It is expected that we will test this process in early to mid-2025.
- We have continued to use case hearings in the majority of cases. To assist the Decision Body in reaching a fair decision, it is now the default position that there is a period of adjournment between the hearing and the decision to aid reflection and deliberation, with the length of this adjournment being dependent upon the complexity of each case. This allows for thorough consideration of the merits of the complaint by the Deciding Body and to take advice as appropriate. The decision is then communicated in a debrief or by decision letter. Decision letters are now being used as an alternative to a case hearing only in a small minority of cases where sufficient evidence has been gathered to allow a decision to be made, and when it is beneficial to the parties.

'...Per Ardua, ad Astra...'



- Noting some of the consequences of the MyComplaint App and to increase the ability to reach prompt informal resolution with the agreement of parties involved, we have created a new role of Informal Resolution Officer to assist with identifying and actioning such cases. We are also working closely with the Service Discipline (SD) teams across our 3 Human Resources (HR) Wings to ensure that all parties with the Service Complaints system are supported, the intention is to formalise the working relationship early in 2025 for the mutual benefit of all, the parties to the complaint and the respective SC and SD/HR teams.
- Having identified that the number of Service Complaints received continues to rise, we are employing additional Reservist case managers, and conducting a broader workforce review, to better understand our optimum staffing footprint for SCT in the coming years. This work should report early in 2025.
- The new tri-Service Case Management System (CMS) is now utilised by the RAF SCT Case Managers. Following the integration of the system into the Service Complaints system in April 2024, it has slowly improved as a management tool. However, there remains room for improvement in the system, particularly with respect to its ability to produce actionable management information, which has proven to be extremely challenging for this reporting period. We continue to work closely with tri-Service and MOD colleagues in developing CMS and the 'My Complaint' Application to ensure there is a further step-up in delivery for our Service and our people. To allow us to continually review and improve RAF Service Complaints delivery, ready access to MI and performance indicators is essential.

Finally, on behalf of the RAF I would like to thank you for your work in supporting the RAF SCT in improving the Service complaints system and the experience of all our personnel involved in this process.



Deputy Chief of the Air Staff

'...Per Ardua, ad Astra...'



Appendix I – Sources of further information

Further information on the Service Complaints system, in the form of publications and/or statistics, can be found at the following locations:

Website	Details
Service Complaints Ombudsman for the Armed Forces https://www.scoaf.org.uk	SCOAF’s 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.
Ministry of Defence https://www.gov.uk/government/organisations/ministry-of-defence	This site provides information on the organisations within Defence, reports and data, and guidance.
Ministry of Defence Service Complaints information https://www.gov.uk/guidance/armed-forces-service-complaints-process	The site provides information and guidance on the Service Complaints system.
Ministry of Defence statistical and research publications https://www.gov.uk/government/organisations/ministry-of-defence/about/statistics	This is where the Ministry of Defence publishes accredited official statistics on a range of defence-related topics.

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

Enquiries about this publication should be directed to:

Media enquiries	Communications@scoaf.org.uk
Statistical enquiries	StatisticsSpt@scoaf.org.uk
Requests for hard copies of the full report	Policy@scoaf.org.uk

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

 Website:	www.scoaf.org.uk
 Email:	Contact@scoaf.org.uk
 Phone:	0300 369 0689
 Postal address:	PO Box 72252 London SW1P 9ZZ



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