

Title	Annual Complaints and FOI Requests Report 2024-2025
Description	An overview of the following functions within the SIA for financial year 2024 - 2025: <ul style="list-style-type: none">• Complaints volumes, demographics and root causes• Enquiries from MPs and the Home Office• Freedom of Information requests• The internal “Ideas” process
Paper owner	[REDACTED]
Paper author	[REDACTED]
Agenda reference	07
Meeting date	8 May 2025
Purpose	The Board is invited to <i>discuss</i> the report

Board members wishing to request clarification on a paper should contact the paper’s owner in advance of the meeting. Material responses to the requests will normally be circulated to all Board members prior to, or at, the meeting.

Freedom of Information

Reference to discussion on this paper at the meeting will usually be published in the Board minutes unless exempted under the Freedom of Information Act 2000. Board papers may be published or released on request unless exempted under the Freedom of Information Act 2000.

Should any of this paper (in whole or in part) be considered for exemption under freedom of information? **No**

Introduction

The purpose of this paper is to provide an overview of the following functions within the SIA for financial year 2024 - 2025:

- Complaints volumes, demographics and root causes
- Enquiries from MPs and the Home Office
- Freedom of Information requests
- The internal “Ideas” process.

Recommendation or purpose

The Board is invited to discuss this paper.

Strategic relevance

Set out how the issue relates to the strategic plan and annual business plan. Identify whether core business or the relevant strategic theme and insert the specific business plan deliverable.

Strategic theme	Business Plan deliverable
Regulating effectively	✓
Improving individual standards	
Improving business standards	
Driving strategic partnerships	
Supporting our people	
Regulating efficiently	✓
Core business	✓

Analysis and implications

There are no issues to raise in connection with the discharge of SIA’s public sector duties.

Finance and resources

There are no finance or resourcing issues to raise in connection with this paper.

Legal and policy

There are no legal or policy issues to raise in connection with this paper.

Risks

There are no risks to bring to the Board’s attention.

Statutory and regulatory requirements

There are no actions required to comply with these requirements including Regulator’s Code, Public Sector Equality Duty, Growth Duty, Human Rights Act, General Data Protection Regulation, Welsh Language Scheme, Data Protection Act.

Incoming Complaints and Performance

1. The SIA defines a complaint as “any expression of dissatisfaction with what we do that cannot be dealt with quickly or easily by our Customer Support team. (By ‘quickly and easily’ we mean where a specific issue can be put right straight away, and the customer has no further issues or concerns.)”
2. Most submissions received through our complaints form are not logged as formal complaints. Reasons for this include:
 - There is no expression of dissatisfaction, such as when the submission is a general service request.
 - The submission is not about the SIA itself. For example, it is about a security operative, company, or training provider. Where appropriate these are forwarded on internally.
 - The issue can be quickly resolved by the Customer Support team.
3. Every submission received on the complaints form is reviewed by a member of the Complaints Team to decide what action needs taking.
4. In financial year 2024-25 we logged **598** formal complaints. This was from a total of **5478** submissions on the complaint form, meaning 11% of submissions were logged as complaints. This continues a trend of a dropping acceptance rate of complaints, as it was 13% the previous year, and 17% the year before that. This is despite the number of submissions on the complaint form increasing slightly overall from 5304 to 5478. This figure does not include complaints from MPs or the Home Office, which are covered separately later in this report. However, we are currently looking at way to incorporate some of the data collected from MP enquiries into our wider complaint data.
5. The higher number of submissions but lower number of formal complaints is possibly caused by more customers going straight to the complaints form for standard service requests. This is a risk of having a complaints option alongside other contact options on the website, as customers may choose it either because they are unsure which other option fits their enquiry, or because they perceive it will get them a quicker response.
6. We are aware that response times by Customer Support to standard service requests have been extremely good all year. Therefore there should be no pressure towards the complaints form due to delays on other channels of contact. However this does not mean there is not a perception that using the complaints form will result in a faster response.
7. The table below shows formal complaint numbers over the past 5 years:

Year	Complaints received
2024/25	598
2023/24	682
2022/23	735
2021/22	630
2020/21	282

This is now the second year in a row that we have seen a drop in the number of formal complaints received.

8. The SIA has had a specific complaints option on both the website contact form and user's online account contact forms since April 2001. This made it much easier to complain and accounts for the huge increase in complaints for year 2021/22. However it also made our complaints process much more efficient allowing the team to handle the increased volume.
9. The 598 complaints we acknowledged were from the following groups:

Complainant type	Complaints raised
Licence Applicants	395
Licence Holders	137
Security Business (non ACS)	16
Security Business (ACS)	6
Member of the Public	44

Performance

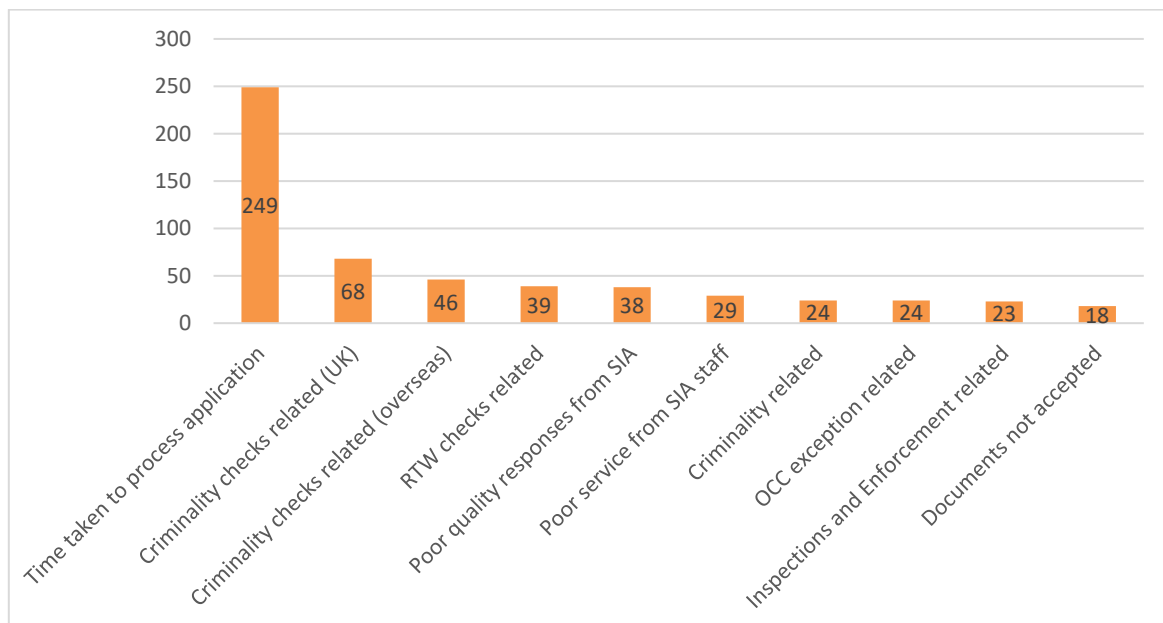
10. We have a target to resolve complaints within 20 working days of acknowledging them. We achieved this in **604** out of **616** complaints (98%) in 2024/25. This is down slightly from 99% the previous year. The number of complaints we responded to is different to number received as not all complaints are resolved within the reporting period in which they are received.
11. This drop is in part caused by the fact that we now handle internal reviews within our complaints system. These are where a customer is unhappy with the outcome of their complaint and requests a review. These must be carried out by a senior manager who will fully review the complaint. Internal reviews are subject to the same timescale target as first level complaints but more likely to be resolved outside of target due to the limited number of staff who can handle them and time pressures on those staff.
12. Other cases that we responded to outside of 20 days included complex cases where allegations had been made against SIA staff members that needed to

be thoroughly investigated, either by an Investigations Manager or by Professional Standards.

- 13. We have only been contacted by the Parliamentary and Health Service Ombudsman (PHSO) once this year. This case did not proceed as the customer had not exhausted our internal complaints process before escalating to the PHSO. We are aware of one other customer who has contacted the PHSO. However we have not received any contact from the PHSO regarding this case.

Why we receive complaints

- 14. By far the largest cause of complaints was the time taken to process an application with this being a factor in 249 complaints. However this is down significantly from 383 the previous year. It should also be noted that the SIA handled over 204,000 applications over the same period, meaning that only roughly 0.1% triggered complaints about timeliness.
- 15. The 10 most frequent reasons for complaints are shown in the chart below. This data makes no distinction on whether a complaint was upheld or not. It also records the reason we received a complaint based on what the customer said. This may be different to the true root cause. We report on root cause data later in this report.



- 16. These numbers will also not correlate with the number of complaints resolved as we can record more than one cause for a complaint. For example, a

customer may be unhappy with both the time an application is taking and the way we are conducting our criminal record check.

17. The quotes below are taken from actual complaints received in 2024/25 to give examples of the sort of complaints we receive:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Complaint Demographics

18. This demographic data on complaints relates to the 598 submissions that we acknowledged as formal complaints in the past year. Where broken down figures do not add up to 598 this is because we do not hold that demographic data for all complainants.

19. Demographic data on licence holders overall is pulled from a snapshot of all licence holders on 4 April 2025. We have compared these to look for where we receive significantly more or fewer complaints from a demographic when compared against the proportion of our licence holders from that demographic.

Gender

	Complaints received	% of total complaints	% of licence holder population
Male	546	91	89
Female	52	9	11

20. The proportions of licence holders and complainants are broadly similar, with women slightly less likely to complain than men. This data is very similar to the previous year.

Nationality

	Complaints received	% of total	% of licence holders
British	339	57	54
Pakistani	63	11	15
Nigerian	35	6	6
Irish	13	2	0.7
Afghan	12	2	0.5

- 21.** This mostly tracks with the nationalities of our licence holders, with the top 3 nationalities of licence holders also being the top 3 nationalities of complainants.
- 22.** This is the second year in a row that Afghan applicants have made up a higher proportion of complainants than licence holders. We are aware that this is because they are disproportionately likely to have to go through the overseas criminal record exception process. This is lengthy and complex process with more scope for both errors on our part and frustration on the customer's part.
- 23.** Irish applicants also make up a higher-than-expected proportion of complaints, though the number in absolute terms is still small. We have reviewed all these cases and found no clear trend in the cause of these complaints. Most are residents of Northern Ireland. Many relate to the time taken while we assess criminal records or intelligence on file, but this is usual across complaints in general.

Age

	Complaints received	% of total	% of licence holders
18-24	55	9	13
25-34	181	30	29
35-44	154	26	22
45-54	96	16	18
55-64	76	13	13
65-74	19	3	4

- 24.** There is no obvious trend or people being more or less likely to complain based on their age.

Country of residence:

	Complaints received	% of total	% of licence holder population
England	463	77	90
Scotland	54	9	5
Wales	33	6	3
Northern Ireland	24	4	2
Other	24	4	0.1

- 25.** This information is generated based on the postcode listed for the complainant at the time of reporting. "Other" includes both addresses outside the UK, and complaints from people we do not hold a postal address for.

26. It is noticeable that applicants living in Scotland, Wales and Northern Ireland are more likely to complain than those living in England. This has been a constant for Scotland for the past few years, but it is the first time we have seen this for Northern Ireland and Wales. We have previously attributed the elevated complaint rate from Scotland to the manual and relatively time consuming nature of Disclosure Scotland checks when compared to other disclosure bodies.

Complaint Root Cause Data and Analysis

27. Of the **616** complaints we resolved in 2024/25 we upheld **303** (49%). This is an increase from 40% the previous year and 43% the year before that.

28. The table below shows the top 5 teams where errors originated that caused upheld complaints.

Team	Number of complaints 2024/25	Number of complaints 2023/24
Decisions – Applications and Appeals	76	80
Customer Support	46	58
Decisions – Licence Review	39	21
Decisions – Right to work	37	26
Decisions – Case and Process Assurance	18	4

29. We have continued to see a decrease in the number of complaints attributable to Customer Support, down from 111 in 2022/23.

30. Complaints caused by the Applications and Appeals team nearly doubled between 2022/23 and 2023/24, so it is pleasing to see that this increase has stabilised and started to drop slightly.

31. We have seen an increase in complaints caused by errors in the other Decisions teams, and this warrants further investigation into what is driving this.

32. Of the 303 complaints that we upheld the single biggest root cause was queue management, which caused 125 complaints. These are complaints where no single person has made an error, but a case was not looked at as soon as it should have been.

33. The next largest cause was human errors, which caused 99 complaints this year. This is slightly up from 96 the year before.

34. The third largest cause was technical errors, which caused 59 complaints. These are where some element of our system has not behaved as expected, or a glitch has occurred.

35. Last year we reported that we were hoping to incorporate error reporting from complaints into the new quality monitoring software that was being procured at

the time. The procurement took longer than expected but is now complete and we are looking at our options here.

- 36.** In June 2024 we introduced new root cause options for the processes that cause complaints. This brought the options in line with our current processes, but also provided more options overall, allowing us to capture more granular data.
- 37.** As we used 2 different sets of root cause data in the past year, we have limited this section of the report to the 235 complaints that were resolved since the new options were introduced. Of these 235 complaints the 3 biggest root cause processes were the Sworn Oath and Character reference process (29), the DBS application process (16), and intelligence flags on accounts (16). As this is the first year that we have had these root cause codes we cannot compare these directly to previous years.

MP and Home Office Enquiries

- 38.** In 2024-25 we were contacted **83** times by either elected representatives or the Home Office. The table below shows numbers for the past 4 years.

Year	Number of enquiries
2024/25	83
2023/24	78
2022/23	110
2021/22	141

- 39.** Of these, we were contacted directly by MPs or their staff on **64** occasions. We were contacted 3 times by MSPs and once by a member of the Northern Irish Assembly. We received no contact from Welsh Senedd members this year.
- 40.** We were contacted on 10 occasions by the Home Office following someone contacting them directly. The Home Office contacted us on 5 occasions following an MP writing to them about the SIA.
- 41.** The 69 times we were contacted by MPs (64 directly and 5 via the Home Office) broke down by nation as follows:

Nation	
England	58
Wales	0
Scotland	9
Northern Ireland	2

- 42.** Of the **83** times we were contacted, **69** met our definition of a complaint. Those that were not complaints included the following:
- Offers to assist a customer who is struggling to provide information we have asked for
 - Asking if security operatives could be given powers of arrest

- Asking whether funding is available for SIA licence linked training
 - Request for higher wages for security operatives
 - Reporting concerns about operatives or companies to us (intelligence)
- 43.** Of the 69 that met our definition of a complaint we identified errors by the SIA in 25 cases (36%). This is an increase from the uphold rate of 27% in 2023/24 but exactly the same as in 2022/23. It is significantly lower than the 49% uphold rate for complaints received directly from customers. This is something we see each year. We attribute this to people being more likely to complain to their MP about our policies, such as how we check criminal records, or keeping an application on hold until a criminal case has been resolved. Where someone is having problems with our service, they would normally be able to resolve this by contacting us directly and would not feel the need to escalate to an MP. However, we do still see occasional cases where the first indication that someone is unhappy is when their MP contacts us.
- 44.** We are currently looking at ways to incorporate the data from MP enquiries into our wider complaints root cause data. This will allow it to feed into a bigger data set and make it easier to analyse.

Freedom of Information Requests

- 45.** Since April 2021 Freedom of Information (FOI) requests have been handled by Legal Services.
- 46.** In financial year 2024-2025 the SIA responded to **79** FOI requests. Of these, **72 (93%)** were responded to within the statutory timeframe of 20 working days.
- 47.** The **7** that were responded to late were caused by the following:
- Information Asset Owner incurred delays in quality-checking the information (this was the case for **5** of the requests);
 - Highly sensitive request requiring extra quality-checking from senior management in various departments
 - Additional quality-checks required by Legal Services to verify the accuracy of information.
- 48.** We received **1** request for an internal review of a response. This internal review was upheld our original response. No requests were escalated to the Information Commissioner's Office (ICO).
- 49.** The way we respond to FOI requests is categorised as follows:

Response	Number of cases
Provided in full	42
Refused in full	1
Part provided/exemption used	5
Part provided/part refused	1
Part provided/part not held	4

Part provided/part not held/exemption used	4
Part not held/exemption used	1
Part refused/not held	2
Exemption used	6
Exemption used/ part refused	1
Not held	11
Other	1

For the majority of FOI responses, there is not just one category of response and some fall into a split category. This is where the SIA can provide information to one of the questions asked, but another question satisfies a statutory exemption. To ensure the accurate recording of data, the FOI team use split categories.

The 'Other' category for this financial year relates to a request for an opinion.

50. Please note that these figures may vary to what the figure is online as some requests are published and others are not as they are deemed not to serve a wider public interest.

- For example, requests in respect of specific ACS companies and repeated responses where we tell requestors we do not hold the information, and an identical response is already on our website.

51. The requests that we refused in full were refused using the following exemptions:

- Section 21 which is where the information was publicly available elsewhere.
- Section 22 which relates to future publication.
- Section 31 which relates to law enforcement.
- Section 40(2) which relates to personal information where individuals could be come easily identifiable.
- Section 43 which relates to commercial interests (typically applicable to procurement tenders and supplier information).

52. The requests where we did not hold the information requested were related to:

- Qualification, training and assessment information.
- Requests for the SIA to provide an opinion
- The SIA's insurance details and whether the SIA licence dog handler organisations
- General requests related to an apparent lack of understanding of our regulatory remit or activities, such as us not being the correct public body who hold the requested information

- 53.** For cases where exemptions are applied, the most common used are section 43, where the information requested was commercially sensitive, and section 21, where the information was publicly available elsewhere. We also used section 40 for some requests where personal information was requested, or where individuals requested information which, due to very low figures, could not be released as it would easily identify SIA employees or licence holders.
- 54.** We also refused **one** request in full, for exceeding statutory cost and time limitations.
- 55.** The number of FOI requests received each year for the past 5 years is as follows:

Year	FOI requests received
2019-20	102
2020-21	60
2021-22	108
2022-23	90
2023-24	108
2024-25	79

- 56.** Trends, risks and learnings: We have noted that depending upon what is being reported in the media about the security industry the number of requests tend to increase.
- For example, we received a significant number of requests in respect of the SIA's intention to introduce business licensing and after the airing of the BBC File on 4 Documentary on training malpractice within the private security industry.
 - When multiple similar and sometimes identical FOI requests are received concerning the same subject matter, this can stretch the FOI team's resources.
 - During times when FOI requests peak concerning the same subject matter, the FOI team have learnt that they can engage with the SIA's Online Services Team and Communications Teams.
 - This is so that a public comment can be released, addressing frequently asked questions to deter repeated and identical requests and direct the public to information available on our website.

Ideas Process

- 57.** We do not have data for 2024/25 for the ideas as process.

58. The Ideas process has been relaunched for 2025/26 with completely new look. It is now managed using a public Microsoft Lists document. This allows all staff to see which ideas have been submitted, accepted and rejected. The new process is fully transparent which also provides more accountability for both the complaints team and the people that ideas are referred to.

Next steps

59. There are no next steps to raise.