

REPORT CLASSIFICATION	✓	CATEGORY OF PAPER	✓
Official	✓	Proposes specific action	
Official: Sensitive Commercial		Provides assurance	✓
Official: Sensitive Personal		For information only	

BOARD

30 SEPTEMBER 2025

Report Title:

**North East and North Cumbria Integrated Care Board (ICB)
Complaints Annual Report 2024-2025**

Purpose of report

This annual report presents a summary of complaints, concerns, and issues handled by the complaints service from 01 April 2024 to 31 March 2025 for the North East and North Cumbria Integrated Care Board (ICB).

Key points

The purpose of this complaints annual report is to provide assurance to NHS North East and North Cumbria Integrated Care Board (the ICB) that the ICB has fulfilled its statutory responsibilities with regard to complaints management.

The report provides a high-level overview of the primary care and ICB complaints/concerns raised during the year, along with learning from complaint investigations.

The ICB complaint's function was historically managed by two separate teams.

- North of England Commissioning Support (NECS) via a service level agreement - complaints relating to the ICB itself and its commissioning functions but not primary care. This arrangement ceased on 31 March 2025 with the TUPE of the NECS complaints team to the ICB.
- The primary care complaints team – complaints relating to primary care services specifically (transferred from NHS England from 01 July 2023 following the delegation of primary care commissioning to the ICB).

From 01 April 2025 the teams were fully integrated, combining the previous ICB and primary care complaints processes into the one streamlined process for all ICB complaints.

A review has been undertaken to evaluate existing processes within both teams, identify efficiencies, and streamline workflows to establish a unified process for managing all complaints. Work is underway to develop a comprehensive reporting framework to track complaints from registration through activity monitoring, with the aim of identifying learning opportunities and improvements. This will provide assurance to the Board regarding the effective delivery of the complaints function.

The complaints management for 2024/2025 is outlined below:

- **ICB Complaints**
- **Primary Care Complaints**
- **Forward View - 2025/2026**

ICB Complaints 2024/2025

During 2024/2025, the NECS team received a total of 752 new complaints/concerns (compared to 827 in 2023/2024).

Of these, 430 complaints were related to the ICB, representing 57% of the total received during the year (compared to 326 out of 827, or 39% in 2023/2024), showing an increase of 18% for 2024/2025). The remainder related to NHS providers and other organisations.

The main themes and categories of the ICB complaints/concerns continue to be commissioning of access to NHS dental care, all age continuing healthcare and eligibility criteria for Value Based Clinical Commissioning Policy (VBCCP) and Individual Funding Request (IFR) decisions.

Primary Care Complaints – 2024/2025

The team is working to address the backlog of cases from 2024 as well as focusing on new cases that continue to be received. During 2024/2025, the Primary Care team received a total of 945 new complaints/concerns, of which 115 cases were managed as formal complaints - representing 12% of the total received. Additionally, the team managed 1,199 telephone calls during this period.

The main themes of the primary care complaints/concerns received continue to be of a broad spectrum and include areas around appointment availability, clinical treatment, prescribing issues, removal from practice patient list and staff attitude/behaviour and values.

A copy of the learning and improvements from ICB complaints is attached at **(Appendix 1)**.

Future View "Ways of Working" - 2025/2026

From the transition on 01 April 2025, a number of new processes and new ways of working have been introduced to streamline complaints handling. Some of the key actions and details are noted within the complaints report.

Complaints Team Improvement Plan

A comprehensive complaints improvement plan has been developed to address continuing priorities and working practices over the forthcoming three months.

PHSO Record Log

An ICB Parliamentary and Health Service Ombudsman (PHSO) audit record has been created to document all PHSO escalated complaints, including procedures for updating progress on each assigned complaint **(Appendix 2)**.

Reporting Processes – Digital Solutions and Metrics

Work is underway to evaluate several digital solutions aimed at supporting the complaints process, with the goal of improving team efficiency and reducing manual documentation involved in complaint handling.

AuditOne Advisory Briefing Note

Internal Audit conducted an advisory review of the draft Complaints Standard Operating Procedure (SOP) before the ICB finalised the document **(Appendix 3)**.

Risks and issues

- Since the transfer of the primary care complaint's function there has been a continued capacity issues in the team as well as high volumes of enquiries and formal complaints. This has created a considerable backlog of contacts that continues to be progressed. These cases are being prioritised but there remains a reputational risk to the ICB.
- As a result of the transition of the ICB function and NECS staff effective from 01 April 2025, there has also been an impact on the capacity to handle complaints due to ongoing training and development efforts aimed at streamlining and integrating the two combined functions.
- Continued issues with the Serious Incidents Reporting Management System (SIRMs), which is hosted by NECS, has impacted and delayed the implementation of the new streamlined ways of working, including logging complaint data and robust reporting.

Assurances and supporting documentation	
<ul style="list-style-type: none"> Complaints made against the ICB continue to be managed in line with the NHS Complaints Procedure and the NHS Complaint Regulations. A standard approach was introduced from 01 April 2025 to register all ICB and Primary Care Complaints on one system which will provide future robust reporting. NHS England transfer of "Ask, Listen" Do" to all ICB's. The ICB website has been updated to manage the sign posting of all complaints from 01 April 2025. A plan for improving the complaints team is scheduled to be implemented from 01 July to 30 September 2025. A comprehensive PHSO record log has been established to facilitate audit processes, enabling the ICB and PHSO to cross-reference all complaints cases efficiently. AuditOne completed advisory work on the ICB complaints standard operating procedure and provided a briefing note outlining their findings. The 2025/2026 - Q1 and Q2 complaint reporting data will be submitted to Quality and Safety Committee on 13 November 2025. 	
Recommendation/action required	
<p>The Board is asked to:</p> <ul style="list-style-type: none"> Receive and review the annual complaints report for the period: 01 April 2024 to 31 March 2025 for assurance purposes Note the ongoing work to clear the complaints backlog by the end of December 2025 Note the ongoing continued development of the complaints reporting processes 	
Acronyms and abbreviations explained	
<p>ICB – Integrated Care Board NECS – North of England Commissioning Support VBCCP – Valued Based Clinical Commissioning Policy IFR- Individual Funding Request PHSO – Parliamentary and Health Service Ombudsman SOP – Standard Operating Procedure SIRMs – Serious Incidents Reporting Management System KPI's – Key Performance Indicators NICE – National Institute for Health and Care Excellence CKS – Clinical Knowledge Summaries LGSCO – Local Government Social Care Ombudsman</p>	
Sponsor/Approving Executive Director	Claire Riley, Chief Corporate Services Officer
Date approved by Executive Director	15 September 2025
Reviewed by	Deborah Cornell, Director of Corporate Governance and Board Secretary
Report author	Lynda Hutchinson, Head of Corporate Governance
Link to ICP strategy priorities (please tick all that apply)	
Longer and Healthier Lives	✓
Fairer Outcomes for All	✓
Better Health and Care Services	✓
Giving Children and Young People the Best Start in Life	✓
Relevant legal/statutory issues	
Note any relevant Acts, regulations, national guidelines etc	

Any potential/actual conflicts of interest associated with the paper? (please tick)	Yes		No		N/A	✓
N/A						
Equality analysis completed (please tick)	Yes		No		N/A	✓
If there is an expected impact on patient outcomes and/or experience, has a quality impact assessment been undertaken? (please tick)	Yes		No		N/A	✓
Essential considerations (must be completed)						
Financial implications and considerations	Not applicable.					
Contracting and Procurement	Not applicable.					
Local Delivery Team	Not applicable.					
Digital implications	Not applicable.					
Clinical involvement	Yes, this is part of the investigation and response process as appropriate.					
Health inequalities	Yes, this is part of the investigation and response process as appropriate.					
Patient and public involvement	Yes, patient involvement is part of the investigation and response process as appropriate.					
Partner and/or other stakeholder engagement	Yes, partner engagement is part of the investigation and response process for multi-agency complaints.					
Other resources	Yes, as identified under the key points section.					

Complaints Annual Report Summary of Activity

01 April 2024 to 31 March 2025

1 Introduction

- 1.1 The purpose of this report is to provide assurance that the ICB has fulfilled its statutory responsibilities with regard to complaints management.
- 1.2 The annual report provides a high-level summary of ICB and Primary Care complaints activity for the period 01 April 2024 to 31 March 2025, with an overview of the issues raised in complaints/concerns during the year, along with learning from complaint investigations.

2 Background

- 2.1 The ICB complaints function for ICB and Primary Care was previously managed by two teams due to historic arrangements. As of 01 April 2025, this changed with the transfer of the North of England Commissioning Support (NECS) complaints team under TUPE regulations and the integration of the primary care team, resulting in a single, coordinated ICB complaint's function.
- 2.2 Progress has been made on reviewing current processes and exploring future working methods for 2025/2026, with the aim of improving and aligning the complaints function into a unified, streamlined operation and establishing a more robust, integrated reporting structure.
- 2.3 This report provides a breakdown of complaints which relate to the ICB commissioning and those relating to primary care services. Although complaints/concerns about commissioned services can be submitted via the commissioning organisation, most complaints regarding provider organisations are made directly to the service provider. Complaints received by the complaints service about other organisations are routinely referred to the service provider for investigation.
- 2.4 Complaint reports from NHS trusts, outlining trends, themes, and lessons learned regarding their services, are systematically reviewed through clinical quality processes.
- 2.5 As the local commissioner of primary care services, the ICB receives complaints about primary care contractors. All complaints received in relation primary care are reviewed to determine who is best placed to investigate. Complainants are encouraged to contact the primary care provider direct as most concerns can be dealt with on an informal basis and more quickly by the provider, to the benefit of the complainant. If it is determined that there would be no additional value in undertaking a formal commissioner-led investigation of the concerns raised, the complainant is advised, and consent is sought to pass the complaint to the provider. If it agreed that a complaint should be investigated by the ICB and it relates to clinical issues, an independent clinical review is undertaken to inform the formal complaint response.

3 Complaints Activity during 2024/2025

3.1 Performance against key performance indicators (KPIs)

The National Health Service Complaints (England) Regulations 2009 requires complaints to be acknowledged within three working days of receipt.

- ICB Complaints - The ICB achieved this for **95.2%** of formal ICB complaints received in the year. All formal ICB complaints were managed in line with the agreed complaint plan. Where an extension to the timescale for responding to a complaint was required, the complainant was kept up dated. Due to resourcing issues, the timescale for responding to ICB commissioning complaints was extended from six weeks to three months from receipt of consent/approval of the complaint plan.
- Primary Care Complaints – The ICB achieved this **59%** for the 46 formal complaints received in the year. A total of 37% of formal primary care complaints were completed within the three months' timescale.

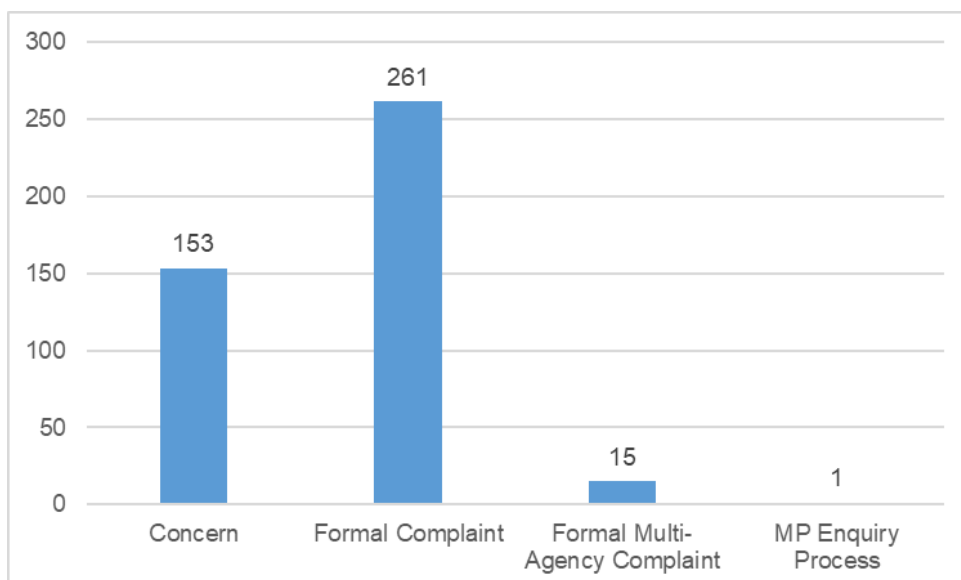
3.2 Complaints/concerns received in the year 2024/2025

3.2.1 Overall activity

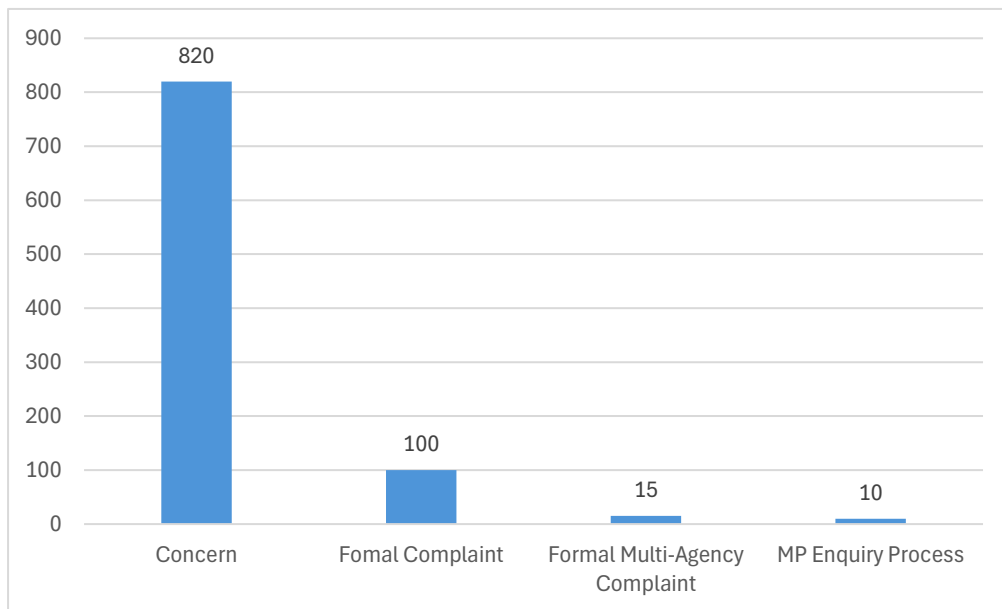
- ICB Complaints - 752 new complaints/concerns were received in the year (compared to 827 in 2023/2024). Of these, 430 related to the ICB, representing 57% of the total received during the year (compared to 326 out of 827, or 39%, received in 2023/2024), showing an 18% increase for 2024/2025.
- The remainder related to NHS providers and other organisations.
- Primary Care Complaints – 945 complaints/concerns were received by email during the year, of which 115 cases were managed as formal complaints, representing 12% of the total received. Additionally, a total of 1,199 telephone calls were received.

3.2.2 Grade of cases received for ICB and Primary Care

- ICB Complaints - a breakdown of the 430 ICB cases by grade is shown in the chart below. Of the 430 ICB cases received, 276 were managed as formal complaints or multi-agency formal complaints, representing 64% of the total ICB cases. The remainder were managed via other processes, for example, as informal concerns/signposting.

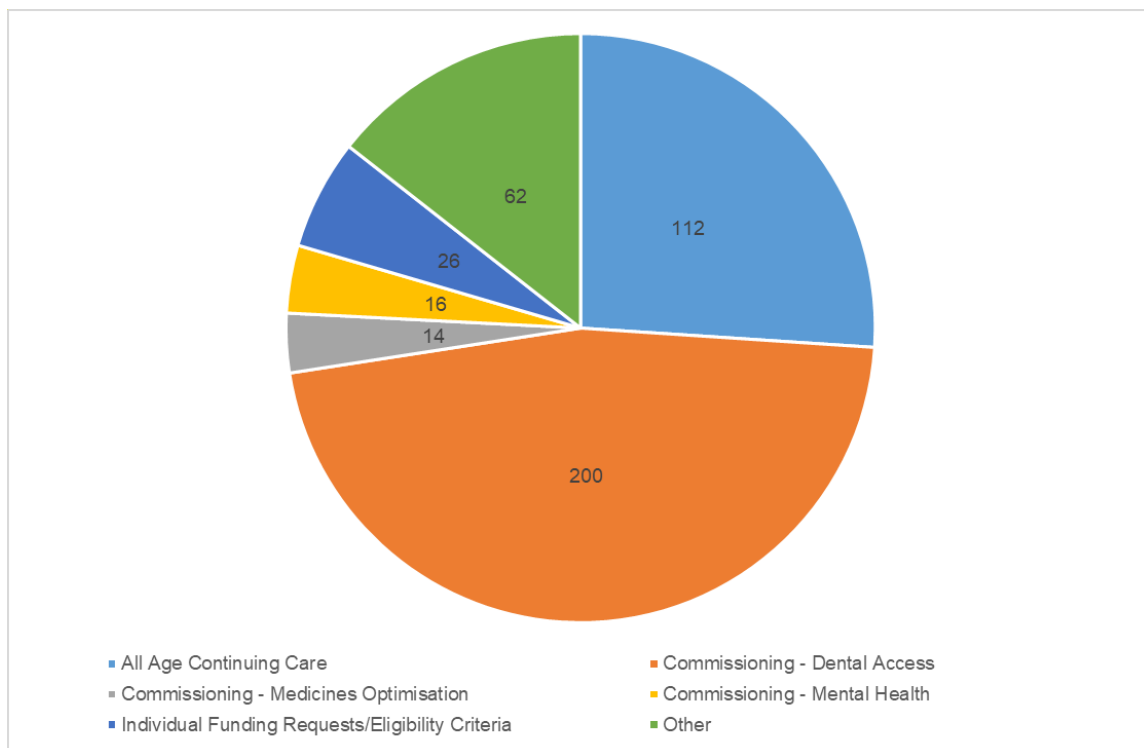


- Primary Care Complaints - a breakdown of the 945 primary care cases by grade is shown in the chart below. Of the 945 ICB cases received, 115 were managed as formal complaints or multi-agency formal complaints, representing 12% of the total ICB cases. Complainants are encouraged to liaise with their practice to resolve any issues informally where possible, with support from the ICB team, to avoid the need to go through a formal complaint process.



3.2.3 Categories of cases received

The ICB-led complaints/concerns received in the year were categorised as follows:



3.2.4 Themes from complaints received

The key themes identified in ICB complaints/concerns are as follows:

- Access to NHS dental care (200, 46%) – complainants required advice/clarification regarding problems with accessing routine and emergency dental care and information on how the ICB is addressing this issue
- All Age Continuing Healthcare (112, 26%) – most frequently raised type of AACC concern/complaint was about delays in processes e.g. appeals process
- Eligibility Criteria (VBCCP) & IFR decisions (26, 6%) – fertility treatment and breast surgery were the most frequently raised treatments

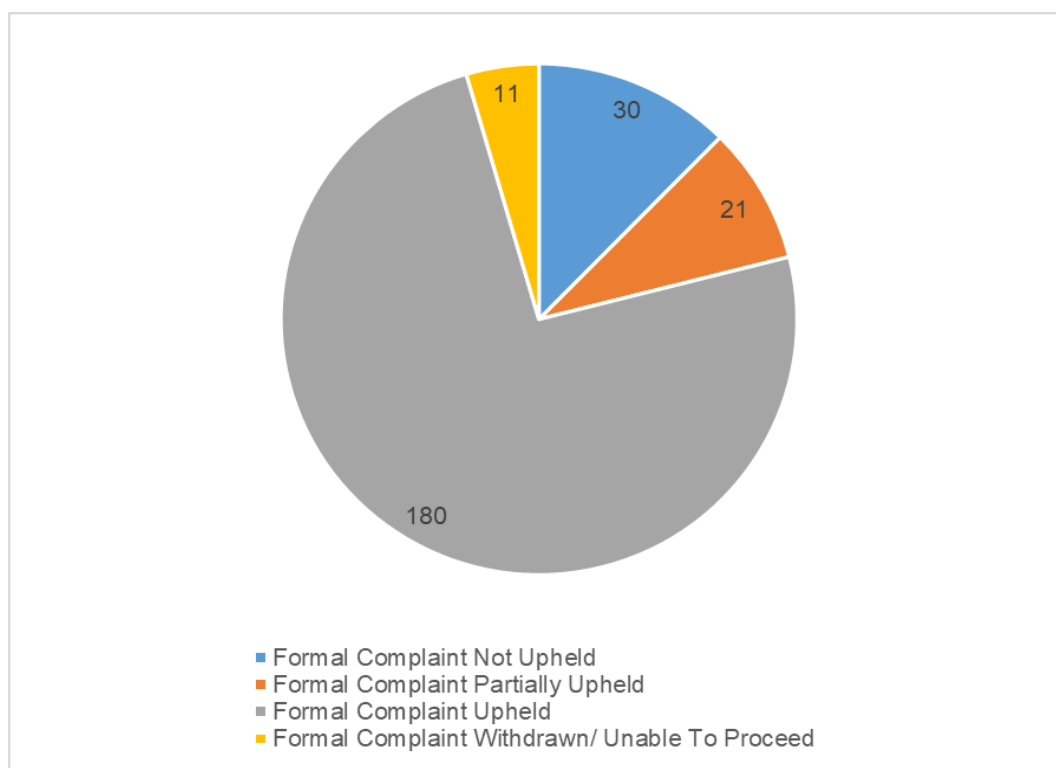
The key themes identified from complaints/concerns about primary care are as follows:

- Appointment availability / waiting time for appointments
- Clinical treatment
- Prescribing issues / errors
- Failure / refusal to refer
- Attitude / behaviour of staff
- Removal from practice patient list
- Communication issues

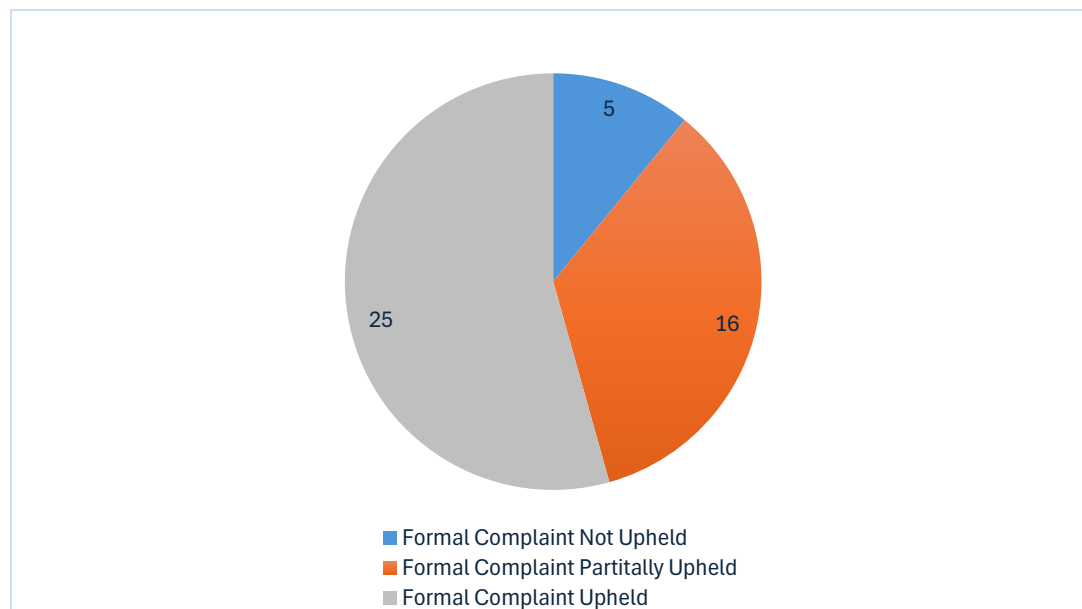
3.3 Complaints/concerns closed in the year 2024-2025

3.3.1 Outcomes

A total of 242 ICB formal complaints were responded to/closed during the year; the outcome types are shown below. Following investigation, 201 formal complaints were upheld/partially upheld, 30 were not upheld and 11 were withdrawn/unable to proceed.



A total of 46 Primary Care formal complaints were responded to/closed during the year; the outcome types are shown below. Following investigation, five formal complaints were upheld, 16 partially upheld, 25 were not upheld and a number of the complaints were withdrawn via patient consent.



3.3.2 Categories of upheld complaints

The categories of upheld/partially upheld ICB complaints were as follows:

	Total
Primary Care Dental Access	156
All Age Continuing Healthcare	27
Other	59
Total	242

The categories of upheld/partially upheld Primary Care complaints were as follows:

	Total
Clinical treatment (including errors)	15
Staff attitude / behaviour / values	3
Appointment availability / length	1
Failure to diagnose	1
Inaccurate / incorrect records	1
Total	21

4 Learning from ICB and Primary Care complaints 2024/2025

4.1 The service improvements identified from ICB complaints investigations are listed below by area (from upheld or partially upheld complaints/concerns)

- All Age Continuing Healthcare
- Cancer care
- Children's end of life care commissioning
- Community pharmacy commissioning
- COVID-19 and flu vaccination programme
- Dental care commissioning
- GP practice commissioning
- Weight management

Full details of the learning and improvements from complaints can be found in **Appendix 1** of this report.

4.2 Service improvements identified from investigations into primary care have been specific to the practice / practitioner involved. Most practices discuss formal complaint investigations at team meetings or time out sessions, to identify and share learning. If a complaint relates to an individual they are asked to discuss the complaint and associated learning at their next performance appraisal. Examples of service improvements include:

- Review of operational policies
- Provision of additional training, ranging from customer services to specific clinical procedures
- Improvements with regard to the quality of medical records including the level of detail recorded, clarity and accurate coding
- Familiarisation with specific evidence-based National Institute for Health and Care Excellence (NICE) Clinical Knowledge Summaries (CKS), when the care and treatment of a patient with a particular presentation was found not to follow best practice.

5 **Stage 2 - NHS Complaints Procedure (Ombudsman) - 2024-2025**

5.1 **Overview of Ombudsman contacts**

Where a complainant remains dissatisfied following local resolution of their complaint, they may request the involvement of the Parliamentary and Health Services Ombudsman (PHSO) or Local Government and Social Care Ombudsman (LGSCO) as the second stage of the process. An overview of the ongoing PHSO cases for the ICB is shown below:

- ICB Complaints - received contacts from officers at the PHSO/LGO regarding 18 ICB complaints as follows: 13 were requests for records/further information to support assessments/investigations by case workers.

Request for records/further information to support assessment/investigation	13
Notification of Ombudsman decision not to investigate the complaint	2
Notification of Ombudsman decision to investigate the complaint	1
Complaint partially upheld following Ombudsman investigation	1
Complaint upheld following Ombudsman investigation	1

- Primary Care Complaints - the ICB is being contacted by the PHSO on behalf of patients who have not received a response to complaints that they submitted. The concern being the length of time that has lapsed since receipt of each complaint. These cases are now being investigated appropriately. Good progress has been made in reviewing the backlog of primary care cases, which should improve this, although it is anticipated that further such contacts will continue to be received until the backlog is addressed.

Request for records/further information to support assessment/investigation	2
Notification of Ombudsman decision not to investigate the complaint	1
Notification of Ombudsman decision to investigate the complaint	1
Complaint partially upheld following Ombudsman investigation	0
Complaint upheld following Ombudsman investigation	0

5.2 Complaints upheld/partially upheld by Ombudsman

- 5.2.1 Details of the ICB complaints upheld/partially upheld following Ombudsman investigation can be found in **Appendix 2** to this report.

6. Current Risks and Issues

- 6.1 As a result of the transition of the ICB complaints function from NECS and the TUPE of the staff from 01 April 2025, there has been an impact on the capacity to handle complaints due to ongoing training and development efforts aimed at streamlining ways of working and establishing one overall complaint's structure and process.
- 6.2 Historically there were two separate processes in place to manage ICB and Primary Care complaints. Following the combining of the teams, a standard approach was introduced from 01 April to register all complaints on one integrated system (SIRMS). There have been continued issues with the SIRMS system (hosted by NECS) which delayed the team's progress in implementing the new ways of working and streamlined processes. The issues included inability to access information prior to 01 April 2025; lack of access to the required templates to support robust reporting from the system; continued access issues for some team members preventing the logging of complaints data; and a lack of expertise within NECS to support the system appropriately. These issues have now been resolved with NECS procuring some additional expertise support for SIRMS from another CSU and NECS allowing the required access.
- 6.3 Whilst the capacity constraints have now been addressed, there is still a backlog of some primary care complaints, concerns and enquiries to be processed. However, this is being addressed as a matter of priority and weekly monitoring of progress is in place, with updates provided to the Director of Corporate Governance, Chief Corporate Services Officer and Chief Executive.
- 6.4 Due to the differing complaints processes and capacity constraints, it has not been possible to produce a detailed analysis of themes and trends from contacts received or learning from complaint investigations for Primary Care for this report. However, the SIRMS system data input and reporting processes have been improved to enable the team to capture this data more robustly and provide a more detailed overview of the performance of the complaints function. This will include identifying areas of learning and improvement from closed complaints.
- 6.5 There are currently 10 ongoing/reopened complaint cases from 2023 due to their complexity and involvement of the PHSO, however these are now nearing completion. This could pose a reputational risk for the ICB with those patients and the practices involved due to the considerable length of time that has lapsed.
- 6.6 Mitigating actions have been put in place to address the risks and issues noted above and have been incorporated into the detailed complaints action plan. Due to the level of detail contained within the plan it has not been included on this occasion; however, the Committee is asked to consider whether it would wish to receive an update on the plan at its next meeting for assurance.

7 Future View "Ways of Working" - 2025/2026

- 7.1 A comprehensive complaints improvement plan has been developed to address continuing priorities and working practices over the next few months. Some key actions include conducting audits of complaint backlogs from 2023/2024 and 2024/2025, as well as

implementing a robust reporting framework to ensure that all complaints are managed through formal local resolution procedures and in line with the NHS Complaints (England) Regulations 2009.

- 7.2 The ICB has developed a PHSO audit record to record all contacts and progress in relation to those complaints either being reviewed for investigation or being investigated by the PHSO. A communication protocol is in place with the PHSO to perform monthly audit checks, ensuring that all cases are recorded and moving through the complaints process in a timely manner. The data from this record will be reported to the Committee and Board to provide the progress on all held PHSO cases.
- 7.3 A number of initiatives are underway to introduce further improvements within the SIRM system to ensure future reports provide comprehensive complaints data to provide more robust assurance to the Committee on progress with improving the ICB's complaints management function. Capturing more accurate complaints data will also support the team in identifying any areas of learning and improvement from closed complaints.
- 7.4 Work is also underway to assess appropriate digital solutions to support the complaints processes. This includes creating an online complainant consent form, which will be accessible on the ICB complaint's webpage, as well as more interactive and user-friendly information to help support complainants through the complaints process more easily. The goal is to enhance both team efficiency and accessibility for complainants within the complaint handling process.
- 7.5 Based on the Internal Audit advisory review, the Complaints Standard Operating Procedure (SOP) has been updated to incorporate their feedback to further strengthen and support the new streamlined processes and revised reporting procedures. The SOP will be reviewed on a continual basis to ensure it remains up to date and reflective of the ongoing developments within the complaints process. A copy of the outcome of the advisory review is attached at **Appendix 3** for information.

8. Recommendations

- 8.1 The Board is asked to:
- Receive and review the annual complaints report for the period: 01 April 2024 to 31 March 2025 for assurance purposes
 - Note the ongoing work to clear the 2024/2025 backlog by the end of December 2025
 - Note the ongoing continued development of the complaints reporting processes

Name of Author:	Lynda Hutchinson, Head of Corporate Governance
Reviewed by:	Deborah Cornell, Director of Corporate Governance and Board Secretary
Sponsoring Executive Director:	Claire Riley, Chief Corporate Services Officer
Date:	03 September 2025