Agenda Item 15

Enclosure   13

Health and Care Professions Council
22 September 2016

Six monthly review of feedback and complaints

For discussion

From Ruth Cooper, Service and Complaints Manager

Council, 22 September 2016

Six monthly review of feedback and complaints

Executive summary and recommendations

Introduction

The Health and Care Professions Council (HCPC) has operated a feedback and complaints function since 2004. Complaints, positive feedback, correspondence of note and letters from MPs are logged as part of the process. A report of this feedback, including a summary of every complaint and response is reviewed on a monthly basis by the Executive Management Team to identify learning points and process improvements.

The attached paper is a summary of the feedback received between 1 October 2015 and 31 March 2016. The paper outlines the feedback trends over the last six months. The paper also summarises some of the corrective action that has been put in place as a result of stakeholder feedback. Logging and reviewing feedback is an ISO 9001 and ISO 10002 requirement.

Decision

This paper is for discussion however no decision is required.

Background information

The HCPC's customer service policy is available at:
www.hcpc-uk.org/aboutus/customerservice

Resource implications

None

Financial implications

None

Appendices

Appendix 1 – ISO 10002 clauses descriptions
Appendix 2 – Table of complaints by month
Appendix 3 – Root cause analysis descriptions
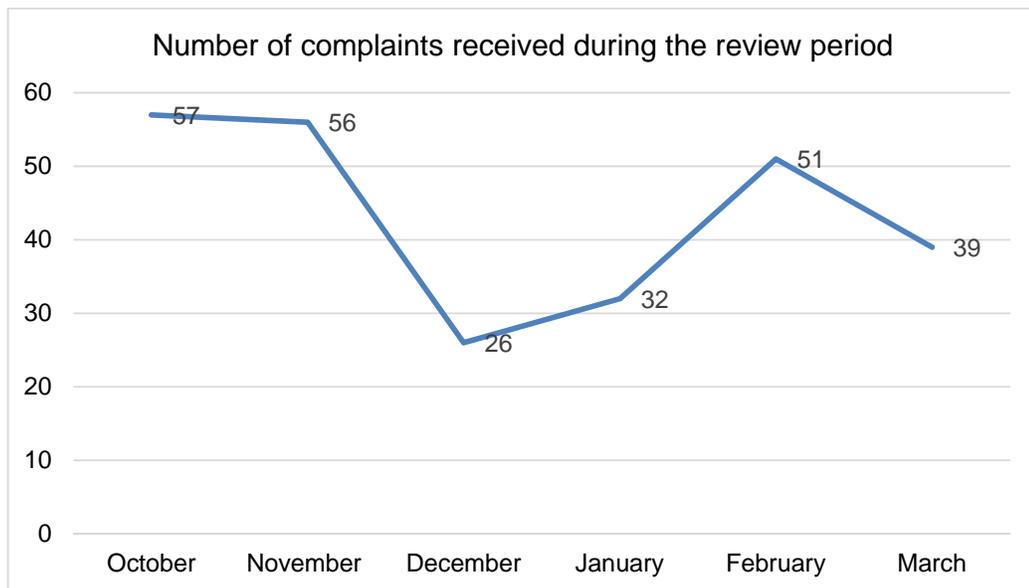
Date of paper

9 June 2016

1.0 Introduction

1.1 This report is a summary of the complaints and feedback that the Health and Care Professions Council (HCPC) received in the second half of the last financial year, 1 October 2015 to 31 March 2016.

1.3 Feedback received by the HCPC includes complaints and positive feedback. Requests for information and comments about processes and procedures are also logged and reported on.

1.3 During this six month reporting cycle (1 October 2015 to 31 March 2016), 261 complaints and 71 pieces of positive feedback were received. The majority of complaints received were about policies, processes and service related to the Fitness to Practise and Registration departments. These are the departments with the most registrant and public facing transactions.

1.4 The report provides a review of the complaints that we have received in the last six months, comparisons across the professions that we regulate, corrective action put in place and positive feedback.

2.0   ISO 10002

2.1   During this reporting period, we implemented the ISO Standard for complaints management, ISO 10002. Between October 2015 and January 2016, we worked with an external consultant to bring our feedback and complaints system in line with the Standard.

2.2   During January and March 2016 we were audited by the British Standards Institute (BSI) to ensure that we met the Standard. The first stage audit, which was a document review, took place in January.

2.3   The second stage audit took place in March and involved audits of the complaints process that sits within the Secretariat and audits of individual complaints received about the Communications, Finance, Fitness to Practise, Policy and Standards and Registration departments. We passed both audits and have received our certificate of registration to ISO 10002.

2.4   The Standard contains eight clauses, five of which are audited against during the certification process. A description of these five clauses are set out in the appendix.

2.5   ISO 10002 re-certification is conducted on annual basis, the next audit will be three days in duration and is due in January 2017.

3.0 Review of complaints received in the last six months

3.1 We received 261 complaints during the reporting period, an average of 43.5 per month. Between December 2015 and January 2016, there was a drop in the number of complaints. In previous years, the number of complaints has been relatively lower in these two months; this appears to be related to less activity taking place within the organisation at this time, including days where the organisation is closed. Five of the sixteen professions that we regulate were in renewal at some point during this reporting period.

Number of complaints received during the review period

Month	Value
October	57
November	56
December	26
January	32
February	51
March	39

3.2 The table below shows the breakdown of complaints received over the last nine years, firstly by financial year, then by six month reporting periods.

	Yearly total	April to September	**October to March**
2006-07	137	108	29
2007-08	160	64	96
2008-09	257	189	68
2009-10	235	82	153
2010-11	221	145	76
2011-12	207	81	126
2012-13	600	227	373
2013-14	573	312	261
2014-15	491	247	244
2015-16	550	289	**261**

3.3   The table below shows the number of complaints received in the last nine financial years with the number of complaints per 1,000 registrants.

Financial year	Number of complaints	Number of complaints per 1,000 registrants
2006-7	137	0.77
2007-8	160	0.90
2008-9	257	1.38
2009-10	235	1.10
2010-11	221	1.01
2011-12	207	0.94
2012-13	601	1.87
2013-14	573	1.79
2014-15	491	1.48
2015-16	**550**	1.61

3.4   The HCPC completes a large number of registrant and public facing transactions. The departments that complete the most external transactions have the highest number of complaints and these departments are Registration and Fitness to Practise. During the last financial year, 550 complaints were logged, 1.61 per 1,000 registrants.

3.5   During the review period we received and responded to 261 complaints. We responded to 227 complaints within our service level of 15 working days, which represents 87 per cent of complaints received. This is the same figure as the last reporting period.

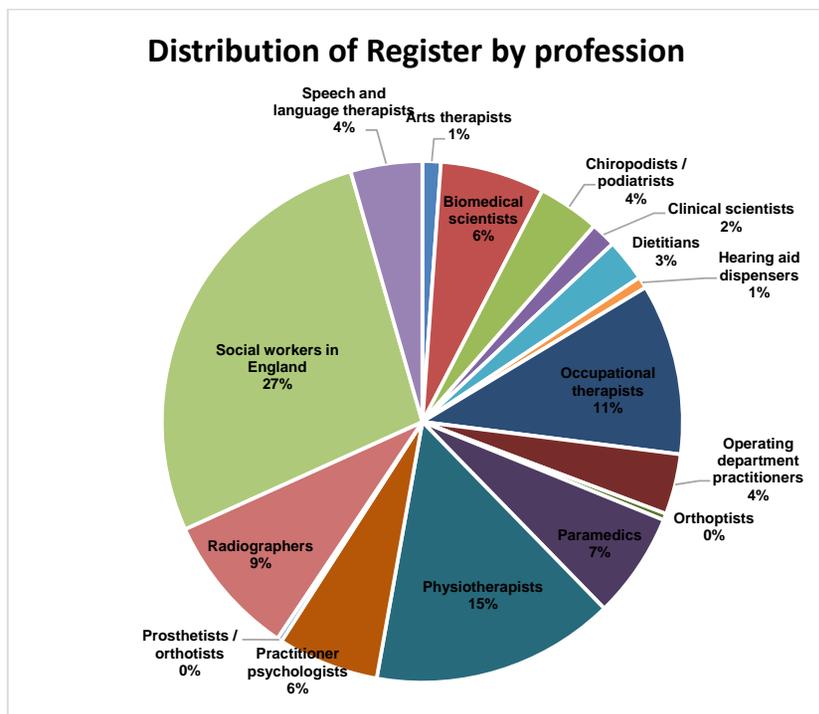3.6   The table below shows how many complaints each department responded to.

Department	Number of complaints
Communications	3
Education	1
Finance	8
Fitness to Practise	128
Human Resources	2
Partners	5
Policy and Standards	2
Registration	110
Secretariat	2
Total	**261**

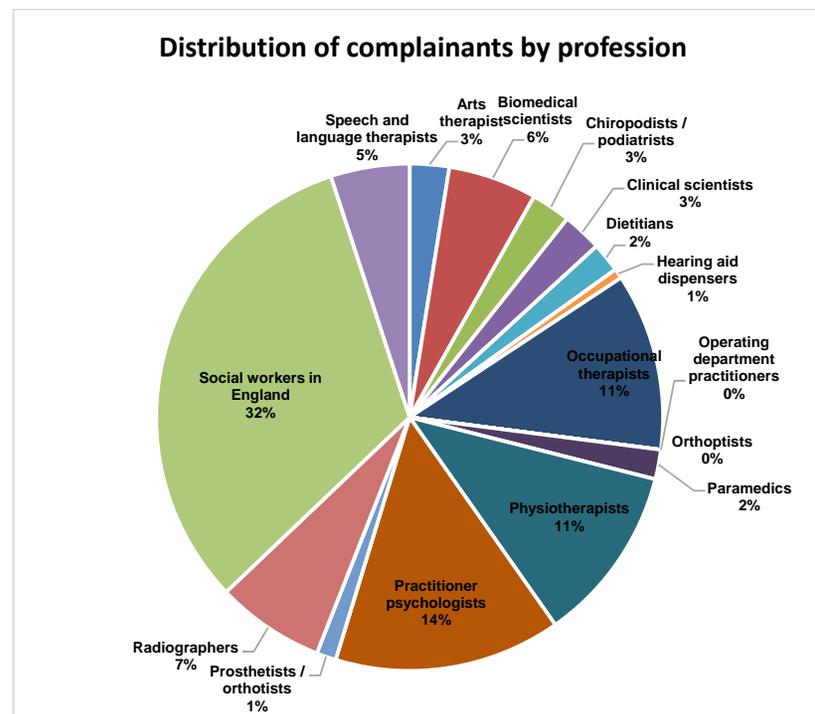## 4.0 Number of complaints received by profession

4.1 During the review period, we received 159 complaints from registrants and applicants where we were able to identify their profession. The highest number of complaints received were from social workers and they are the largest profession on the Register. The following table and graph show the breakdown of complaints received from registrants by profession.

Profession	Total	Number per 1,000 registrants
Art therapists*	4	1.0
Biomedical scientists*	9	0.4
Chiropodists / podiatrists	4	0.3
Clinical scientists	4	0.7
Dietitians	3	0.3
Hearing aid dispensers	1	0.4
Occupational therapists*	18	0.5
Operating department practitioners	0	0.0
Orthoptists	0	0.0
Paramedics	3	0.1
Physiotherapists*	18	0.3
Practitioner psychologists	23	1.1
Prosthetists / orthotists	2	2.0
Radiographers*	11	0.4
Social workers in England	51	0.5
Speech and language therapists	8	0.5

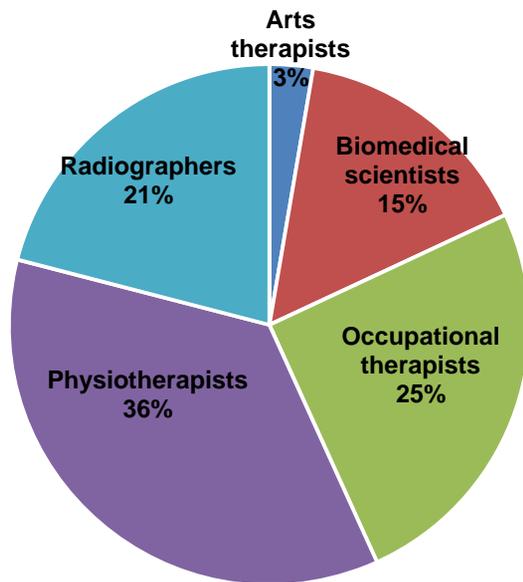*Denotes that the profession was in renewal during the review period.

Distribution of Register by profession

- Speech and language therapists 4%
- Arts therapists 1%
- Biomedical scientists 6%
- Chiropodists / podiatrists 4%
- Clinical scientists 2%
- Dietitians 3%
- Hearing aid dispensers 1%
- Social workers in England 27%
- Occupational therapists 11%
- Operating department practitioners 4%
- Orthoptists 0%
- Paramedics 7%
- Physiotherapists 15%
- Practitioner psychologists 6%
- Prosthetists / orthotists 0%
- Radiographers 9%

The above graph is a graphical representation of the Register broken down by profession.

Distribution of complainants by profession

- Speech and language therapists 5%
- Arts therapists 3%
- Biomedical scientists 6%
- Chiropodists / podiatrists 3%
- Clinical scientists 3%
- Dietitians 2%
- Hearing aid dispensers 1%
- Social workers in England 32%
- Occupational therapists 11%
- Operating department practitioners 0%
- Orthoptists 0%
- Paramedics 2%
- Physiotherapists 11%
- Practitioner psychologists 14%
- Prosthetists / orthotists 1%
- Radiographers 7%

The above graph represents the percentage number of complaints that we received based on profession.

Distribution of Register by profession (in renewal)

Arts therapists 3%
Biomedical scientists 15%
Occupational therapists 25%
Physiotherapists 36%
Radiographers 21%

Distribution of complainants by profession who renewed their registration

Art therapists 7%
Biomedical scientists 15%
Occupational therapists 30%
Physiotherapists 30%
Radiographers 18%

The above graph represents the professions who were going through renewal during the review period.

During the review period, we received 60 complaints from registrants who were in renewal.
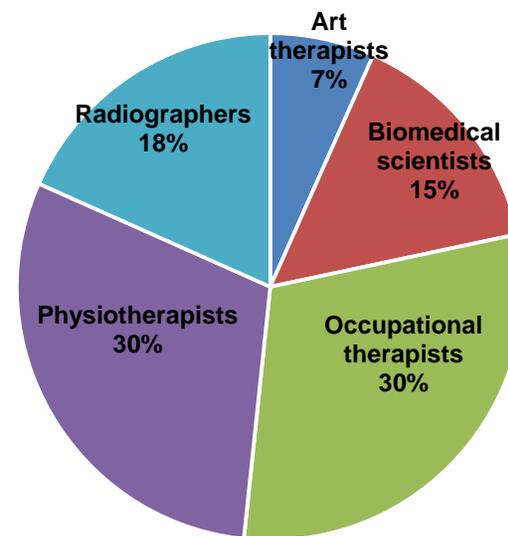
The above graph represents the percentage number of complaints that we received from registrants who were going through renewal during the review period.

4.2   The table below shows the distribution of complainant's professions and the distribution of the profession in proportion to the whole Register. During this reporting period, the percentage of total complaints received from each profession was broadly comparable to the profession's percentage size on the Register for most professions.
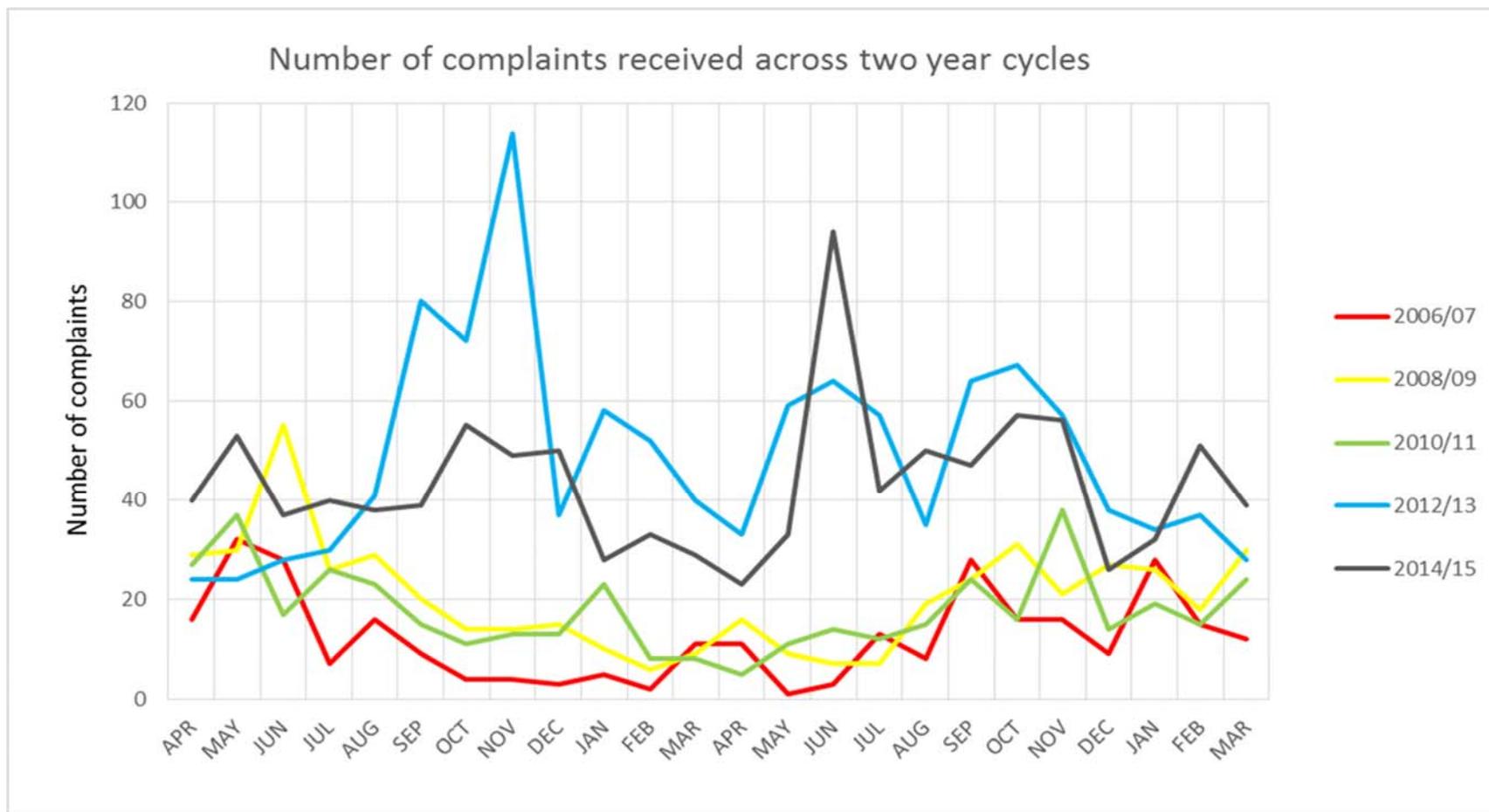
	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapists*	2.5%	1.1%	2.2
Biomedical scientists*	5.7%	6.5%	0.9
Chiropodists / podiatrists	2.5%	3.9%	0.7
Clinical scientists	2.5%	1.6%	1.6
Dietitians	1.9%	2.6%	0.7
Hearing aid dispensers	0.6%	0.7%	0.9
Occupational therapists*	11.3%	10.6%	1.1
Operating department practitioners	0%	3.7%	0
Orthoptists	0%	0.4%	0
Paramedics	1.9%	6.5%	0.3
Physiotherapists*	11.3%	15.1%	0.7
Practitioner psychologists	14.5%	6.3%	2.3
Prosthetists / orthotists	1.3%	0.3%	4.3
Radiographers*	6.9%	8.9%	0.8
Social workers in England	32.1%	27.3%	1.2
Speech and language therapists	5.0%	4.4%	1.1

*Denotes that the profession was in renewal during the review period.

4.3   The last column of the table represents the ratio of the percentage of complaints from a profession to the percentage size of the profession on the Register. A figure of 1.0 means that the number of complaints received from a profession is proportionate to their size within the Register. A number larger than 1.0 represents a larger representation of a profession within the complaints data, and conversely, a figure lower than 1.0 shows that the profession logged relatively fewer complaints.

4.4   No complaints were logged from operating department practitioners or orthoptists.

4.5   Arts therapists, practitioner psychologists and prothetists/orthotists provided more feedback in proportion to their size on their Register. This is less significant for arts therapists and prothetists/orthotists as the total number of registrants in those professions is small and the total number of complaints was four and two respectively. Practitioner psychologists provided more than double the number of complaints compared to their size on the Register.

Number of complaints received across two year cycles

The above graphs shows the distribution of complaints across the last ten years, in two year cycles. The peak in 2012/13 relates to social workers being taken on to the Register and the peak in 2014/15 relates to the increase in registration fees.

5.0   Main areas of negative feedback

5.1   This section provides further details about the main areas of negative feedback received during the review period. Appendix two provides more detail of complaint themes on a monthly basis.

5.2   Readmission process - outside of complaints relating to personal circumstances, for example, an application form being returned because it was incomplete or a person wanting to start a job immediately, complaints and feedback related to:

- Difficulties involved in going through the return to practice process in terms of time and cost.

5.3   Registration renewal - this was the process that registrants complained about most, however the numbers are relatively low considering the volume of renewals being processed, complaints and feedback related to:

- Objections to the employer reminder letters, some registrants consider this a breach of their privacy.
- Registrants continuing to receive correspondence related to renewal when they have informed us that they intend to remove themselves from the Register at the end of the renewal window, either by voluntary de-registration, or allowing their registration to terminate.
- The online renewal portal being too secure in requiring multiple codes, some registrants commented that it was more secure than any online system they had previously used.
- If a registrant is changing their payment method to direct debit, they cannot renew online until they have returned a paper direct debit.
- Renewal from abroad - if a registrant is unable to login to the online renewal portal or locks out of the system, they have a more limited timeframe and options for renewal.

5.4   Removal process - the removal process is run if registrants fail to renew their registration. After the renewal window has closed, registrants are removed from the Register if they have not renewed. Outside of complaints relating to personal circumstances, for example, being unaware of the renewal window, complaints and feedback related to:

- The policy of removing registrants from the Register.
- The necessity to complete and return a readmission form.
- Not using alternative communication methods for contacting registrants.

5.5   Continuing Professional Development audit - outside of complaints relating to personal circumstances, for example, assessment decisions, complaints related to:

- Being selected for CPD more than once, for example, twice within two registration cycles.

5.6   Online Register - registrants provided feedback about additional elements of the online Register. Complaints and feedback related to:

- Not providing details on each registrant's Register entry about the specific protected titles that they can use and details of their practise.
- Not displaying initial registration dates and all dates of registration and qualification details.

5.7   International application process and processing times - the process consists of the submission of an application form, supporting documentation, payment, and qualification and verification checks. Applications are assessed on an individual basis and we aim to provide the initial decision within 12 weeks. Outside of complaints relating to personal circumstances, for example, the application form being returned because it was incomplete or a person wanting to start a job immediately, complaints related to:

- The amount of time taken to receive an assessment outcome.
- Some applicants had no concerns about the process, but were unhappy with the outcome of their application.

5.7.1   We are experiencing higher volumes of international applications than we have previously had. This financial year, we received 5991 new international applications, compared with 4608 last financial year. Between 1 January and 31 March 2016, we received 12.7% more applications than forecasted.

5.8   Pre-Investigating Committee Panel and standard of acceptance decisions - a concern that is raised about a registrant must meet the standard of acceptance to be taken forward to an Investigating Committee Panel. To ensure that allegations are considered appropriately, the standard of acceptance sets out a modest and proportionate threshold which allegations must normally meet before they will be investigated by the HCPC. Complaints have been received about:

- The FTP department not deeming a concern or concerns to have reached the standard of acceptance and therefore not progressing the case to an Investigating Committee Panel.

5.8.1   The majority of complaints about FTP processes come from members of the public (69% of those received in 2015-16). The majority of complaints (from all sources) relates to decisions about cases. More than half of these cases that are closed at the earliest stage are complaints that come from members of the public (54% of those closed pre-ICP in 2015-16).

5.8.2   The number of complaints about closures has increased due to the changes in Standard of Acceptance. We changed the Standard of Acceptance in May 2015 and closed significantly more cases using the new standard. In 2014-15, we closed 1042 cases because they did not meet the Standard of Acceptance, in 2015-16, we closed 1661 cases, an increase of nearly 60% on the previous year. Some of these cases were also older, as we had been waiting to receive information to assess if the standard would be met.

5.9   Investigating Committee Panel decisions and hearings - these relate to the ICP decision to close a case and/or the logistics of the hearing. The number of these complaints has fallen in comparison to previous years which is likely to be partially due to the new Standard of Acceptance and cases being closed earlier in the process.

6.0   Root cause of complaints

6.1   To help the HCPC identify where there may be problems with processes or policies, complaints are classified according to where the error that caused the complaint occurred. The classifications can also help us to identify where there may be a misunderstanding among stakeholders about our processes. Examples of these classifications is provided in appendix 3.

6.2   During the review period, the breakdown of root cause of complaints (where the root cause was available) was as follows:

- HCPC – 23%
- Registrant / applicant – 1%
- N/A – 76%

6.3   The graph below shows the distribution of complaints within the three root cause categories.

Complaint root cause - October 2015 to March 2016

HCPC 23%
Reg 1%
N/A 76%
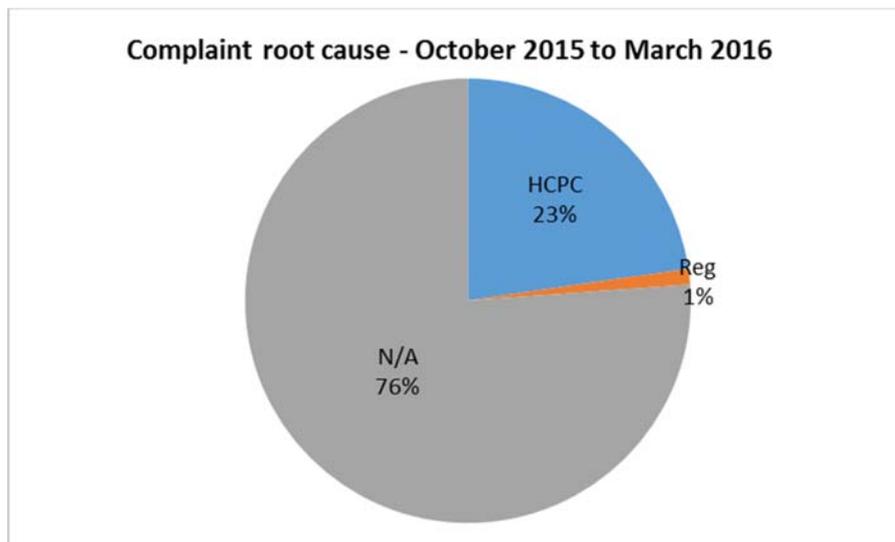
7.0   Corrective action

7.1   The majority of complaints (76%) that were received during the review period were not due to an HCPC error. In these cases, a response to the complainant with details of the relevant policies and processes is often the most appropriate action. An essential part of complaint responses are an explanation of our processes and policies. This is to ensure that we are open, transparent and fair in the way that we handle complaints.

7.2   During this review period, a number of corrective actions have resulted from complaints or been a factor in the development of corrective actions. The following are examples:

- Reviewing telephone calls related to a complaint to ensure that the information provided is correct and asking call-handlers to listen to these calls.
- Regular amendments and additions to the website, standard letters and emails where necessary changes have been identified. This applies particularly in departments that have more interactions with stakeholders including Fitness to Practise and Registration.
- Regular updates to the department through email reminders.
- Training and feedback for employees on a group basis through team and training meetings, complaints have been fed into Registration training workshops.
- Re-writing of CPD letters following feedback about the content, for example, the time and effort registrants have put into preparing their profile.
- Feedback on specific issues to employees after the conclusion of a complaint.

7.3   Complaints feed back into our project work, including providing feedback for the Registration systems and process review with suggestions that have come from complaints and feedback that registrants have provided us, for example:

- A bulk upload system for registrants who are submitting their CPD profile, these documents often contain large amounts of information and cannot be accepted in a single email.
- Communication preferences to include greater use of email, SMS and new technology.
- More payments options for applicants applying for registration and paying their application fee.

8.0 Positive feedback

8.1 The HCPC log positive feedback alongside complaints to ensure that a balance is achieved between areas that could be improved and current achievements. During the review period we logged 38 pieces of positive feedback. These included cards, letters and emails thanking employees for many different types of activity.

8.2 The following are a small number of examples of feedback that we have received from stakeholders:

- Positive feedback from a witness in the FTP Hearing process, "Was kept well informed of the process and was supported professionally to complete statement and evidence requirements (expectations were clear). Was greeted professionally and treated with courtesy at all times by HCPC staff and panel. Arrangements for my attendance were good."
- Positive feedback Registration staff involved in an international application, "I really appreciate all your help! Your guidance and support have been amazing!"
- Positive feedback from a registrant for our Communications team, "Thank you for presenting the talk… I found it very useful and I am sure many others did also... I have had a few questions from staff on the subject and your presentation has helped greatly".

8.3 The table below shows how many pieces of positive feedback have been logged during the last eight years in each reporting period.

Financial year	Number of pieces of positive feedback	Number per 100,000 registrants
2006-07	26	15
2007-08	24	13
2008-09	33	18
2009-10	76	36
2010-11	78	36
2011-12	66	30
2012-13	71	23
2013-14	91	28
2014-15	108	33
2015-16	71	21

9.0   Conclusion

9.1   The number of complaints logged during this reporting period was a small increase on the same period last year and the same as two years ago.

9.2   The distribution of complaints received was balanced across the professions.

9.3   The Fitness to Practise and Registration departments continue to receive the most feedback. Both departments carry out the most individual transactions with registrants and other stakeholders.

9.4   The number of international applications received has increased recently. The Standard of Acceptance for FTP concerns was changed last year. These two factors have changed the profile of complaints over the past year.

9.5   The number of complaints received continues to be in line with previous reporting periods.

9.6   The next report will cover the period 1 April 2016 to 30 September 2016.

Appendix 1

To provide some background to the ISO Standard for complaints management, ISO 10002, a description of the five clauses that are audited against are set out below:

Guiding principles

This provides an overall framework including sub-clauses for visibility, accessibility, responsiveness, objectivity, charges, confidentiality, accountability and continual improvement.

This clause covers main principles such as making the feedback and complaints process easily available and in accessible formats, the timeframe for responses, that no charge should be made for access to the complaints process and that the organisation should seek to improve the process on an ongoing basis.

Complaints-handling framework

This clause covers the commitment, policy and responsibility and authority of the complaints process including roles and responsibilities of those involved.

Planning and design

The clause covers the planning and design of the complaints process including that the process is efficient, is designed to improve customer satisfaction, has objectives, that the process can be linked to other relevant processes and that the process is properly resourced.

Operation of complaints-handling process

This clause covers the detail of the complaints process from receipt and acknowledgement of complaints, through tracking, investigation, response and complaint closure.

Maintenance and improvement

This clause covers the detail of reporting on complaint and the complaints process, satisfaction with the process, auditing, management review, and continual improvement.

Appendix 2

This table provides a summary of the main issues that were identified in complaints during each month, the departments that responded to complaints, the customer service policy and root cause.

Review month	Number of complaints received	Main issues (summary)	Number of complaints per department	Customer service policy	Root cause
October	57	• UK registration/registration – registrant renewal reminder letters and employer renewal reminder letters, voluntary deregistration • International registration – time taken to progress applications • FTP – decisions not to progress concerns to an Investigating Committee Panel, Hearings issues	Fitness to practise - 28 Registration - 29	78%	HCPC 28% Reg 0% N/A 72%
November	56	• UK registration/renewal – renewal issues, online renewal portal, payment of fees • International registration – time taken to progress applications • FTP – decisions not to progress concerns to an Investigating Committee Panel, customer service	Communications - 1 Education - 1 Finance - 4 Fitness to Practise - 19 Partners - 4 Registration - 26 Secretariat - 1	91%	HCPC 27% Reg 4% N/A 69%
December	26	• UK registration/renewal – various renewal issues • FTP – decisions not to progress complaints to ICP stage	Finance - 1 FTP - 13 Partners - 1 Registration -11	90%	HCPC 8% Reg 4%

					N/A 88%
January	32	• UK registration/renewal – various registration issues • International registration – time take to process applications • FTP – decisions not to progress concerns to an Investigating Committee Panel	Communications - 1 FTP - 17 Policy and Standards - 1 Registration - 13	88%	HCPC 22% Reg 0% N/A 78%
February	51	• UK registration/renewal – various registration issues • International registration – time take to process applications • FTP – decisions not to progress concerns to an Investigating Committee Panel, customer service	Communications - 1 Finance - 3 FTP - 35 Human Resources - 1 Registration - 11	86%	HCPC 16% Reg 0% N/A 84%
March	39	• UK registration/renewal – various renewal issues • International registration – time take to process applications • FTP – decisions not to progress concerns to an Investigating Committee Panel	FTP - 16 Human Resources - 1 Policy and Standards - 1 Registration - 20 Secretariat - 1	90%	HCPC 29% Reg 0% N/A 71%

Appendix 3

Root cause analysis

Three groups are used to classify complaints, they are:

- HCPC – the HCPC has made a mistake that caused the complaint, or made a mistake whilst addressing the issues raised in the complaint. Examples of complaints in this category include giving incorrect advice to a registrant or incorrectly returning an application form.

- Registrant or applicant – the registrant or applicant has made a mistake that has caused their complaint. Examples of complaints in this category include incorrectly completing a readmission form or returning a renewal form after the renewal deadline.

- Not applicable – neither the HCPC nor the registrant are at fault in the issues brought to light by the complaint. Examples of complaints in this category include complaints about the size of the registration fee, regulation of new professions or the correct application of an HCPC policy.