Council 23 March 2017

Review of feedback and complaints – April to December 2016

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 review complaints and responses, and to identify learning points and process improvements.

The attached paper is a summary of the feedback received between 1 April 2016 and 31 December 2016. The paper outlines the feedback trends over the last nine months and 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 one – Table of complaints by month

Date of paper
17 February 2017

1.0   Introduction

1.1   This report is a summary of the complaints and feedback that the Health and Care Professions Council (HCPC) received between 1 April and 31 December 2016.

1.2   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 reporting period (1 April to 31 December 2016), 391 complaints and 35 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; 90% of complaints received in this period were responded to by these two departments. These are the departments with the most registrant and public facing transactions.

1.4   As Council have requested, we will be providing a more comprehensive overview of the processes that complaints relate to. This will be set out in the next report to Council.

1.5   The report provides a review of the complaints that we have received in the last nine months, comparisons across the professions that we regulate, departments that respond to complaints, main themes in complaints and corrective action that has been put in place. Some examples of positive feedback are also included.

2.0 ISO 10002

2.1 During the reporting period we continued to maintain our complaint system in line with the ISO Standard for complaints management, ISO 10002. The Standard provides a framework for managing complaints and includes five clauses that the organisation is audited against:

- Guiding principles
- Complaints-handling framework
- Planning and design
- Operation of complaints-handling process
- Maintenance and improvement

2.2 We first certified against this Standard in 2016, the most recent re-certification audit took place on 26 and 27 January 2017. Planning for this audit took place at the end of 2016, with activities taking place prior to the audit including internal communications, briefings and internal audits.

2.3 During the re-certification audit, the auditor reviewed the complaints policy, processes and documentation. The auditor met with the Chief Executive and the Director of Communications to discuss the HCPC's approach to complaints and objectives for the complaints system over the financial next year.

2.4 The auditor conducted interviews with managers who respond to complaints from the Finance, Fitness to Practise and Registration departments. The auditor also met with the Service and Complaints Manager to look at the complaints database, complaints review process and a sample of other complaints.

2.5 We have been recommended for re-certification to this Standard. The re-certification is conducted on annual basis and the next audit is scheduled for 2018.

3.0   Review of complaints received in the last six months

3.1   We received 391 complaints during the reporting period, an average of 43 per month. In July and August there was a drop in the number of complaints. Complaints were lower than average across both Registration and FTP, and during these months complaints were only received in Registration, FTP and Finance. Seven 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
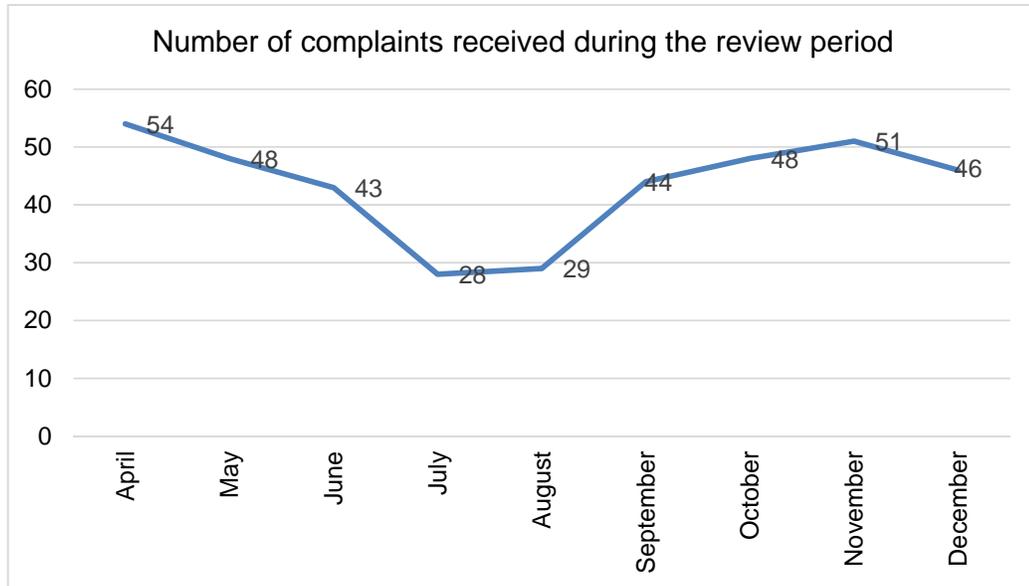
3.2   The table below shows the number of complaints received in the last five financial years with the number of complaints per 1,000 registrants.
       *Note: 2016/17 figures only include complaints up to December 2016.

Financial year	Number of complaints	Average number of complaints per month	Number of complaints per 1,000 registrants
2012-13	601	50	1.87
2013-14	573	48	1.79
2014-15	491	41	1.48
2015-16	550	46	1.61
2016-17	**391***	44	n/a

3.3   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, these departments are Fitness to Practise and Registration.

3.4 During the review period we received 391 complaints. We closed 345 complaints within our service level of 15 working days, which represents 88% of complaints received. This is a small improvement on the last reporting period, where the figure was 87%.

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

Department	Number of complaints
Chief Executive's Office	1
Communications	4
Education	1
Finance	18
Fitness to Practise	163
Operations	2
Partners	6
Policy and Standards	2
Registration	189
Secretariat	5
Total	**391**

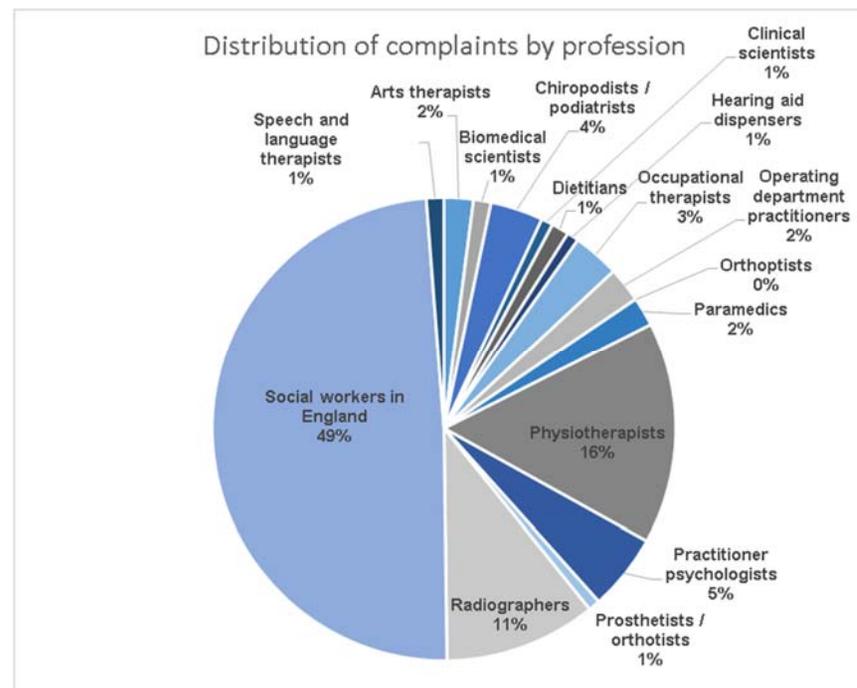## 4.0 Number of complaints received by profession

4.1 During the review period, we received 245 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.

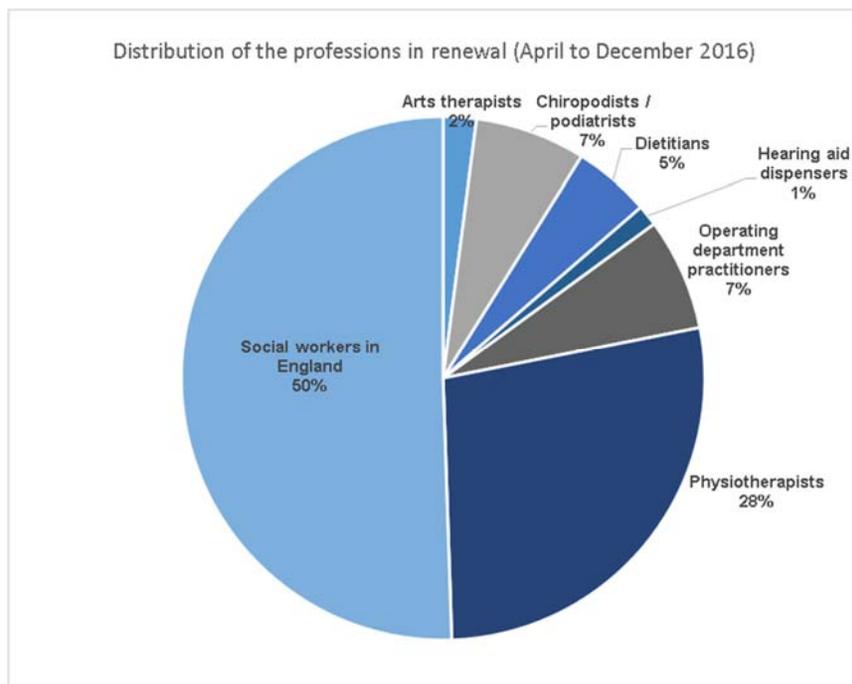| Profession	Total	Number per 1,000 registrants
Art therapists*	5	1.3
Biomedical scientists	3	0.1
Chiropodists / podiatrists*	9	0.7
Clinical scientists	2	0.4
Dietitians*	3	0.3
Hearing aid dispensers*	2	0.8
Occupational therapists	8	0.2
Operating department practitioners*	6	0.5
Orthoptists	0	0.0
Paramedics	5	0.2
Physiotherapists*	38	0.7
Practitioner psychologists	13	0.6
Prosthetists / orthotists	2	1.9
Radiographers	26	0.8
Social workers in England*	120	1.3
Speech and language therapists	3	0.2

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

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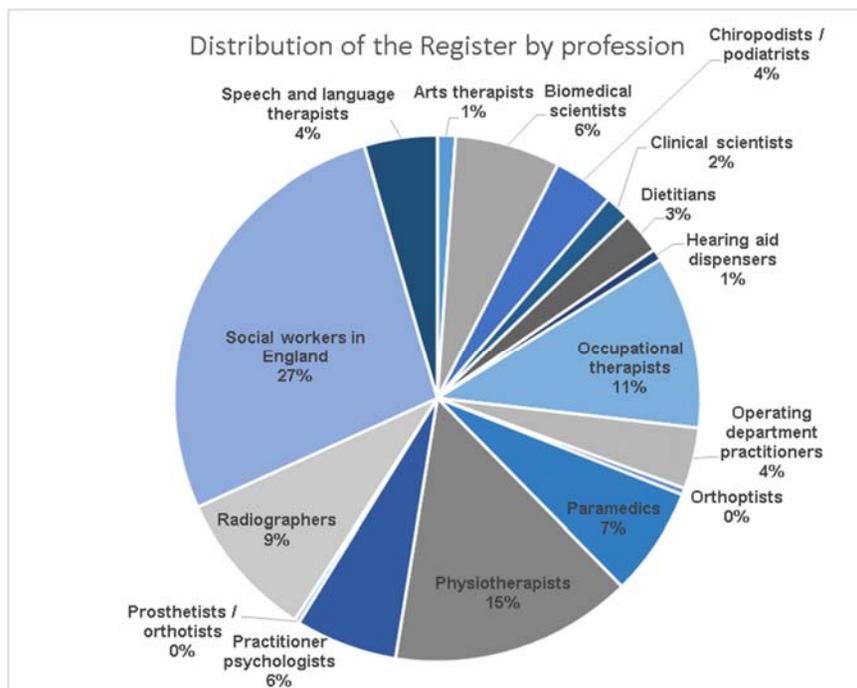
The above graph is a graphical representation of the Register broken down by profession.

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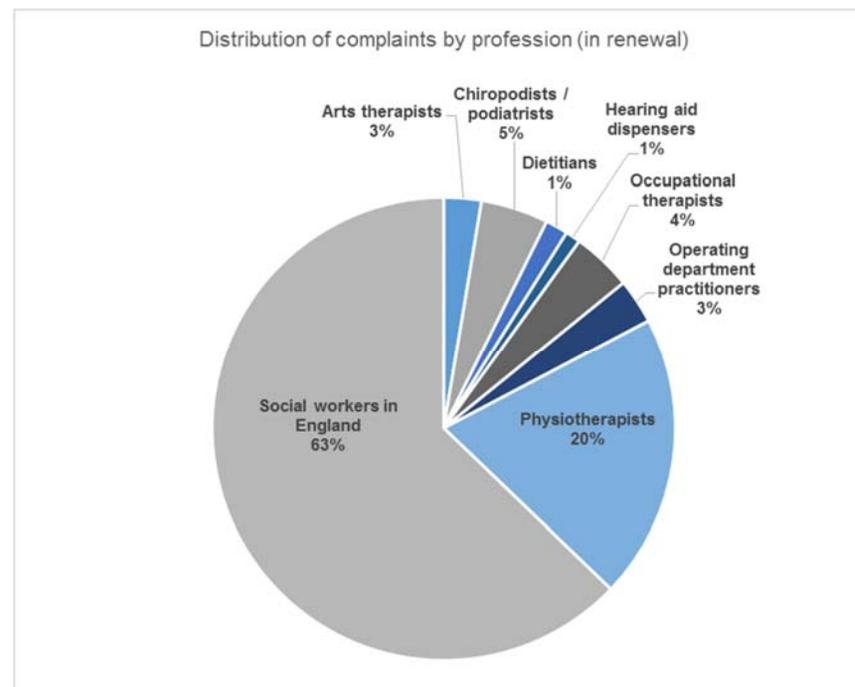
The above graph represents the percentage number of complaints that we received based on profession.

Distribution of the professions in renewal (April to December 2016)

Arts therapists 2%
Chiropodists / podiatrists 7%
Dietitians 5%
Hearing aid dispensers 1%
Operating department practitioners 7%
Social workers in England 50%
Physiotherapists 28%

Distribution of complaints by profession (in renewal)

Arts therapists 3%
Chiropodists / podiatrists 5%
Hearing aid dispensers 1%
Dietitians 1%
Occupational therapists 4%
Operating department practitioners 3%
Social workers in England 63%
Physiotherapists 20%

The above graph represents the professions that were in renewal during the review period.

During the review period, we received 191 complaints from registrants whose professions were in renewal. This compares to 60 last review period (during a six month period rather than nine months), complaints about the renewal process were a more prominent theme during this review period.

The above graph represents the percentage number of complaints that we received from registrants whose professions were in 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.

	Number of registrants	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapists*	3,871	2.0	1.1	1.8
Biomedical scientists	22,621	1.2	6.6	0.2
Chiropodists / podiatrists*	12,896	3.7	3.8	1.0
Clinical scientists	5,452	0.8	1.6	0.5
Dietitians*	8,987	1.2	2.6	0.5
Hearing aid dispensers*	2,457	0.8	0.7	1.1
Occupational therapists	37,451	3.3	11.0	0.3
Operating department practitioners*	13,144	2.4	3.8	0.6
Orthoptists	1,440	0.0	0.4	0.0
Paramedics	23,269	2.0	6.8	0.3
Physiotherapists*	52,106	15.5	15.2	1.0
Practitioner psychologists	21,908	5.3	6.4	0.8
Prosthetists / orthotists	1,054	0.8	0.3	2.6
Radiographers	31,781	10.6	9.3	1.1
Social workers in England*	95,461	49.0	27.9	1.8
Speech and language therapists	15,651	1.2	4.6	0.3

*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   Arts therapists, prosthetist / orthotists and social workers 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 five and two respectively.

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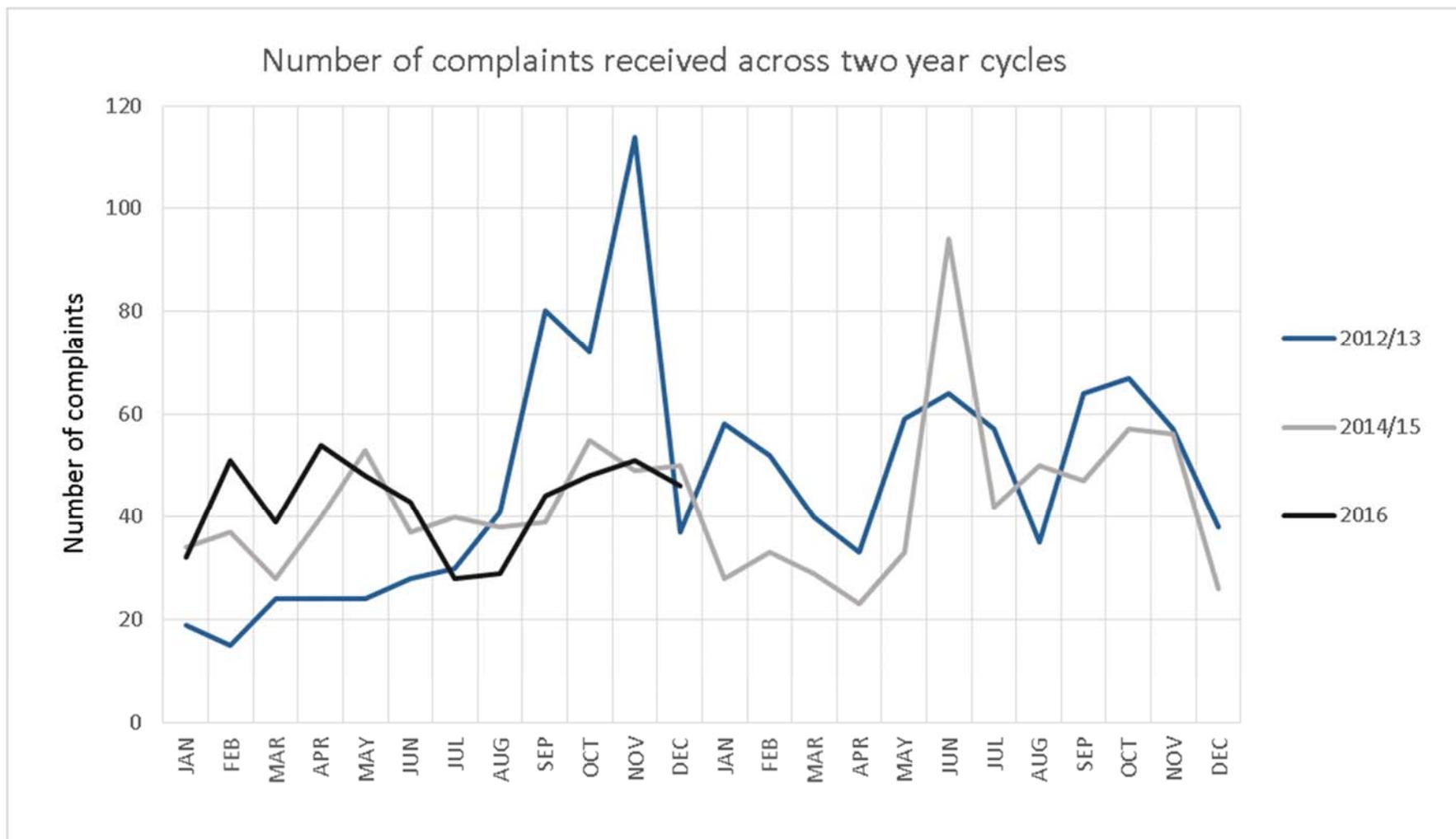
The above graphs shows the distribution of complaints across the last five years, in two year cycles. The peak in 2012/13 relates to social workers being taken on to the Register and the peak in 2014/15 relates to the increase in registration fees.

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 one provides more detail of complaint themes on a monthly basis.

5.2.0 Finance

5.2.1 Registration fees – registrant's complaints related to our application of the Registration and Fees Rules. These were requests to waive or refund part of the registration and/or readmission fee, either because of personal circumstances or because the applicant or registrant felt that the application of the fee was unfair.

5.3.0 Fitness to Practise

5.3.1 The majority of complaints about Fitness to Practise processes were received from members of the public. This is linked to the Fitness to Practice concerns process, more than half of concerns received about registrants from members of the public are closed at the earliest stage pre-ICP stage when these concerns are not deemed to have met the Standard of Acceptance (54% of those closed pre-ICP in 2015-2016).

5.3.2 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 related to individual cases where the FTP department had not deemed a concern or concerns to have reached the standard of acceptance and therefore not progressing the case to an Investigating Committee Panel. Since the changes to the Standard of Acceptance, the number of complaints received about pre-ICP case closures has remained constant.

5.3.3 Investigating Committee Panel decisions and hearings – these relate to the ICP's decision to close a case. The number of these complaints continues to be relatively low as the Standard of Acceptance that was put in place in May 2015 means that the threshold for referring cases to a Panel is higher.

5.4.0 Registration

5.4.1 The majority of complaints (98%) for the Registration department come from applicants, registrants or someone acting on their behalf.

5.4.2   Registration renewal – registrants are required to renew their registration every two years, this process includes a declaration (paper or electronic) and payment for registration fees. Registrant's main concerns were around issues accessing the online renewal portal and objections to the employer reminder letters.

5.4.3   Removal process – the removal process is initiated if registrants fail to renew their registration after the renewal window has closed. Registrant's main concerns were around being unaware of the renewal window, not using alternative communication methods for contacting registrants about their renewal and contacting employers to inform them that registrants were at risk of removal from the Register.

5.4.4   Readmission process – registrants who are removed from the Register (outside of the fitness to practise process) need to apply for readmission if they want their name to be readmitted to the Register. Registrant's main concerns were around the time and cost involved in completing the readmission process. If a registrant has been out of practise for two years or more, they must complete the return to practise process as well; some complaints were received in relation to the time involved in completing this process.

5.4.5   Continuing Professional Development audit – registrants are required to carry out relevant CPD activities and maintain a record of these activities. A sample (2.5%) of registrants are audited every time the profession goes through renewal. Registrant's complaints related to being selected for CPD more than once within two or more registration cycles, with most citing that they felt it was unfair that they had to complete another audit when colleagues had not been selected once.

5.4.6   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. Applicant's main concerns related to the amount of time that their applications took to be processed and the initial and final outcomes of their application.

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.

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

- HCPC – 24%
- Registrant / applicant – 1%
- N/A – 75%

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

Complaint root cause - April 2016 to September 2016
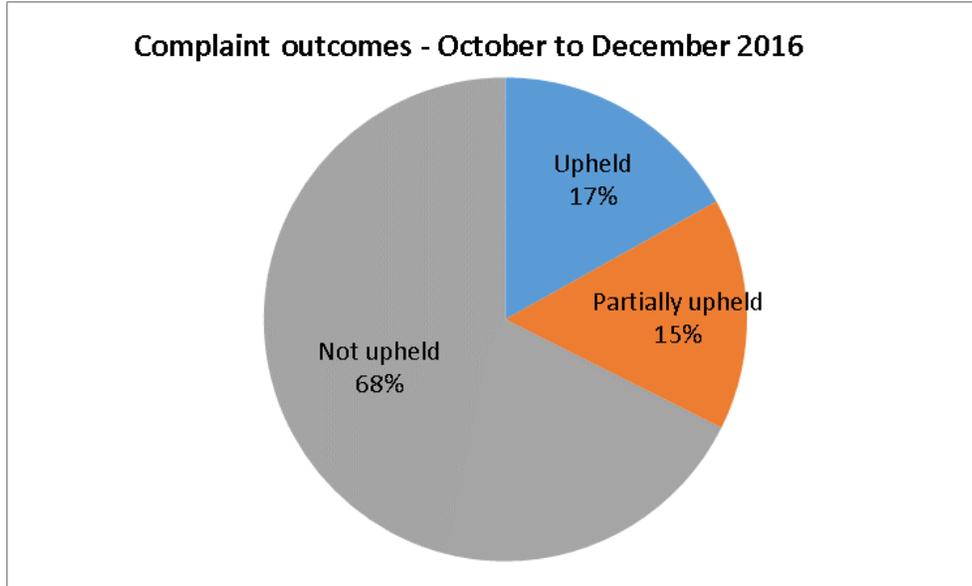
HCPC
24%

Reg
1%

N/A
75%
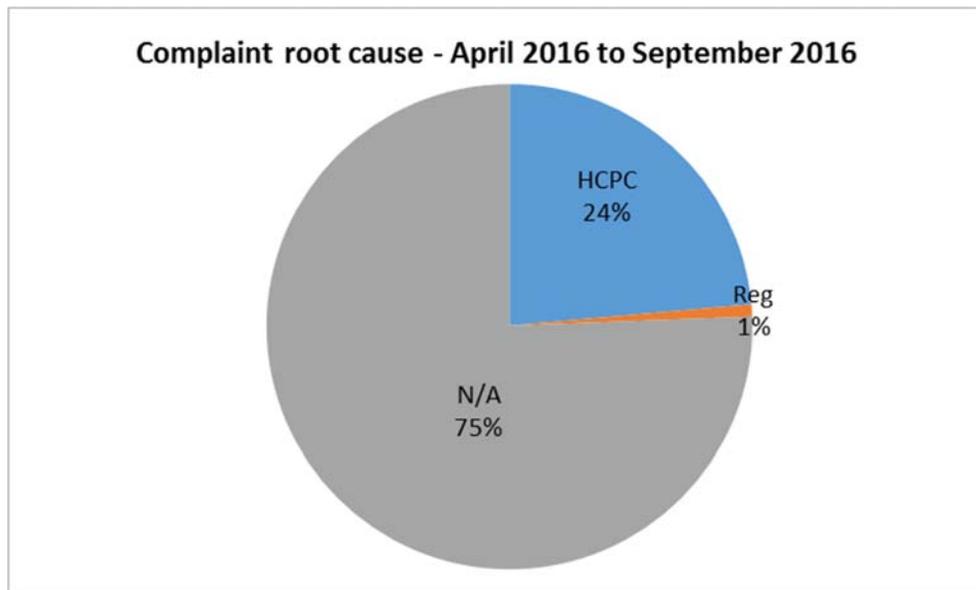
6.4   In October 2016 we started to record complaint outcomes using the categories upheld, not upheld and partially upheld as opposed to the above categories. This change brings us into line with most other organisations and provides a clearer picture of complaint outcomes.

6.5   Between October and December 2016, in line with the new reporting, the breakdown of complaints was:

- Upheld – 17%
- Partially upheld – 15%
- Not upheld – 68%

6.6   The graph below shows the distribution of complaints within the three categories.

Complaint outcomes - October to December 2016

Upheld
17%

Partially upheld
15%

Not upheld
68%

7.0 Corrective action

7.1 The majority of complaints (75% between April and September 2016; and 68% between October and December 2016) 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. When we identify that certain issues are not well understood by stakeholders, we can use this to update our information, for example, application guidance notes and FAQ sections on our website.

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:

- Regular amendments and additions to the website, standard letters and template emails where improvements have been identified.
- Reviewing telephone calls related to a complaint to ensure that the information provided is correct and asking call-handlers to listen to these calls and reflect on the call.
- Implementing an email alert to international registration applicants if their form is being returned for additional information, including the postal tracking number.
- Regular updates to the Fitness to Practise and Registration departments through department bulletins and specific email reminders.
- Training and feedback for employees on a group basis through team meetings.

7.3 Complaints are reviewed for ongoing project work, including providing feedback for the Registration systems and process review. Suggestions from registrants have included:

- More payments options for applicants applying for registration and paying their application fee. The application and readmission fees need to be paid by cheque, bankers draft or postal order, some registrants feel that this is outdated.
- Electronic application process with payment portal.

8.0   Positive feedback

8.1   The HCPC log positive feedback alongside complaints to help ensure that good practice is noted alongside areas that could be improved. During the review period we logged 35 pieces of positive feedback. These included cards, letters and emails thanking employees for many different activities.

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

- Feedback about the hearing process, "thank you for your support yesterday. It was really helpful to have the emails beforehand, and the contact on the day, to help familiarise me with the process."
- Feedback about the organisation related to a visit to HCPC, "I would like to extend our sincere gratitude in hosting us during our visit. The visit was informative and very helpful to our course. Many thanks to your staff who made us feel very welcome."
- Feedback about members of the Communications team presenting information about HCPC, "Very clear. Very concise. Speakers well informed and relayed the information in a very straightforward yet informed manner." and "I thought the key speaker was very receptive to questions and knowledgeable of the topic being discussed."

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
2012-13	71	23
2013-14	91	28
2014-15	108	33
2015-16	71	21
2016-17	35*	n/a

*Note: 2016/17 figures only include positive feedback up to December 2016.

9.0   Conclusion

9.1   We received 391 complaints during the period 1 April to 31 December 2016. The number of complaints that the HCPC has received remains steady, with a monthly of average of 44 complaints per month recorded during the review period, compared to 41 and 46 per month for financial years 2014-15 and 2015-16 respectively.

9.2   Social workers provided the most complaints during the review period. Social workers were in renewal during the review period, the renewal process was one of the main areas of negative feedback.

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   A strong emphasis is placed on corrective action and ensuring that we learn from issues that we encounter in complaints; these are used as a learning tool to understand both where we have made mistakes and where we could be clearer in our communications.

9.5   We logged 35 pieces of positive feedback for individuals and teams across the organisation.

Appendix one

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
April	54	• <u>Renewal</u> – various issues, eg. Online renewal portal – access and authentication codes • <u>International registration</u> – time take to process applications • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	All - 1 CEO's office - 1 Finance - 2 FTP - 26 Partners - 1 Registration - 23	89%	HCPC 30% Reg 0% N/A 70%
May	48	• <u>Renewal</u> – various issues, eg. Removal from the Register and renewal fees • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	All - 1 Communications - 1 Education - 1 Finance - 1 Fitness to Practise - 22 Partners - 1 Policy and Standards - 1 Registration - 20	88%	HCPC 29% Reg 0% N/A 71%
June	43	• <u>Renewal</u> – various issues, eg. Removal from the Register and renewal fees • <u>International registration</u> – time taken to process applications • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage • <u>Partners</u> **–** outcomes of applications/self-assessment process	Finance - 3 Fitness to Practise - 18 Partners - 4 Policy and Standards - 1 Registration - 17	85%	HCPC 16% Reg 2% N/A 82%

July	28	• <u>Registration</u> – application and readmission issues • <u>International registration</u> – time taken to process applications • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	Finance - 2 Fitness to Practise - 12 Registration - 14	75%	HCPC 29% Reg 0% N/A 71%
August	29	• <u>Registration</u> – various renewal and registration issues • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	Finance - 2 Fitness to Practise - 17 Registration - 11	90%	HCPC 21% Reg 3% N/A 76%
September	44	• <u>Registration</u> – various renewal and registration issues • <u>Online renewal portal</u> – storage of passwords in plain text • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	All - 2 Finance - 4 Fitness to Practise - 20 Operations - 1 Registration - 17	91%	HCPC 18% Reg 0% N/A 82%
October	48	• <u>Registration</u> – various renewal and registration issues • <u>Online renewal portal</u> – access to the online renewal portal, issues with activation and authentication codes • <u>Registration department telephone lines</u> – long waiting times and problems getting through the phone system • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	All - 1 Operations - 1 Finance - 1 Fitness to Practise - 13 Registration - 32	92%	Upheld 9% Partially upheld 17% Not upheld 74%

November	51	• <u>Registration</u> – various renewal and registration issues • <u>Online renewal portal</u> – access to the online renewal portal, issues with activation and authentication codes • <u>Registration department telephone lines</u> – long waiting times and problems getting through the phone system • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	Communications - 3 Finance - 1 Fitness to Practise -17 Registration - 30	92%	Upheld 27% Partially upheld 14% Not upheld 59%
December	46	• <u>Online renewal portal</u> – access to the online renewal portal, issues with activation and authentication codes • <u>Registration department telephone lines</u> – long waiting times and problems getting through the phone system • <u>Registration</u> – readmission process • <u>Pre-ICP decisions</u> – decisions not to progress complaints to ICP stage	Finance - 2 Fitness to Practise - 19 Registration - 25	93%	Upheld 16% Partially upheld 16% Not upheld 68%