

Council 15 May 2014

Yearly review of feedback and complaints

Executive summary and recommendations

Introduction

Since 2004 the Health and Care Professions Council (HCPC) has operated a complaints and feedback function. Complaints, positive feedback, correspondence of note and letters from MPs are logged as part of this 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 April 2013 and 31 March 2014. The paper outlines the feedback trends over the last year. Logging and reviewing feedback is an ISO9001 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

None

Date of paper

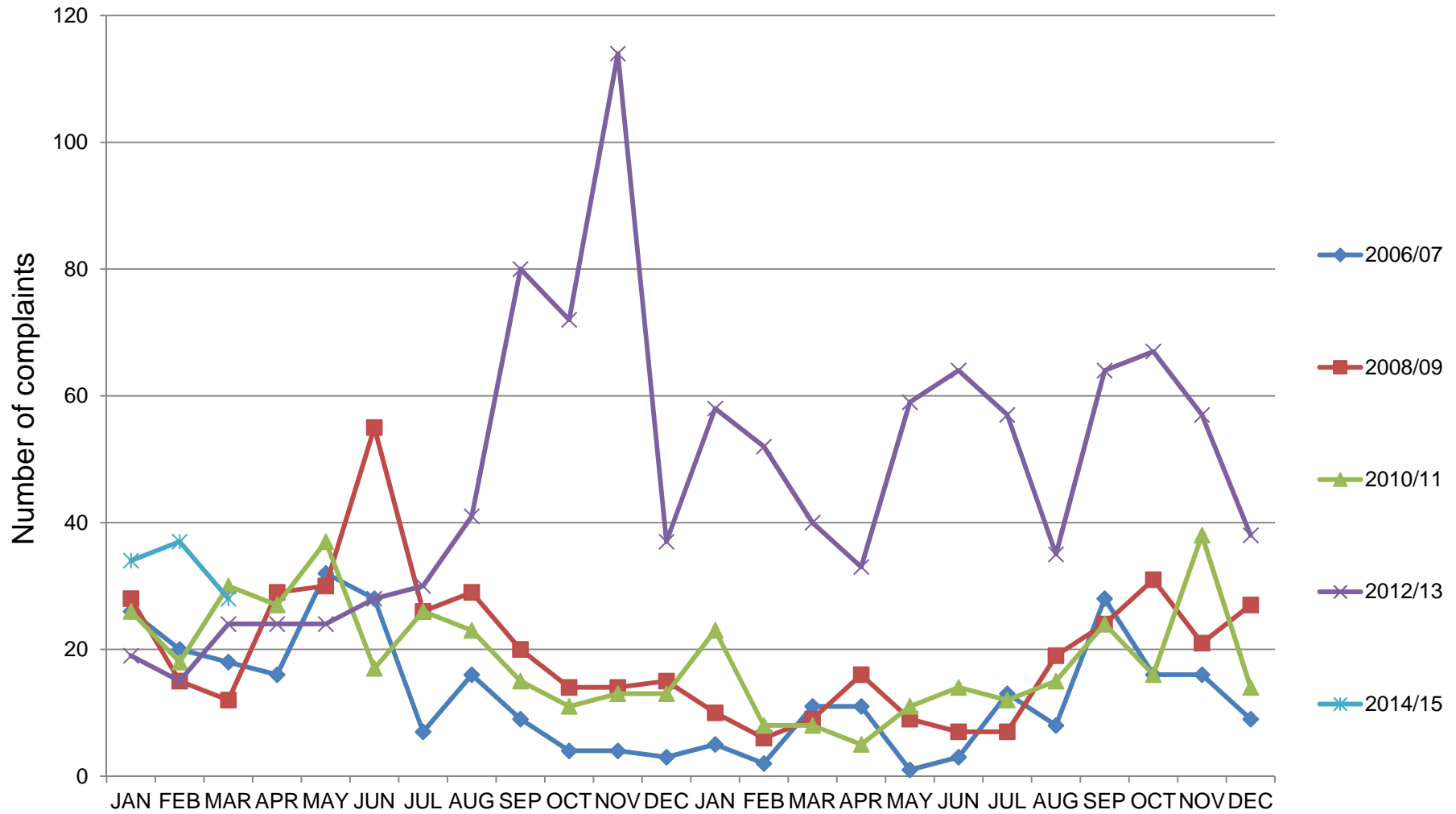
30 April 2014

1.0 Background information

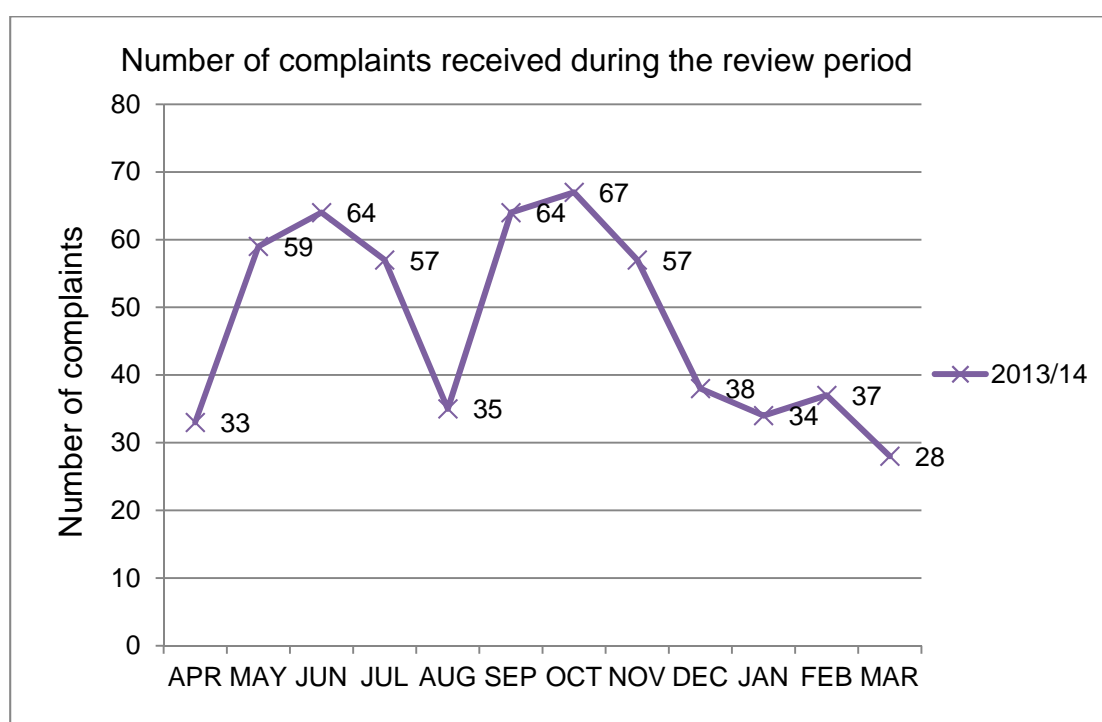
- 1.1 The Health and Care Professions Council (HCPC) has been operating a complaints and feedback function since 2004. The role is carried out by the Service and Complaints Manager in the Secretariat. This post was created in May 2013. Previously the function sat in the Operations Department as part of the PA to the Director of Operations role. The feedback and complaints function at HCPC manages incoming feedback from stakeholders; this includes logging and assigning feedback and complaints across the organisation, identifying urgent complaints and supporting managers with the drafting of responses and handling of issues where requested. Where relevant, the Service and Complaints Manager responds to some complaints directly and drafts responses for the Chief Executive and Chair where appropriate. The manager maintains the complaints database where complaints, positive feedback and notable letters are stored, along with a log of correspondence with MPs. The Service and Complaints Manager works with managers to ensure the quality and consistency of complaint responses, identify corrective actions and ensure that these are implemented.
- 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 The EMT receive a monthly report with a narrative of every complaint and response, response time, root cause and corrective actions. Trends in complaints are identified and are a basis for discussions by the EMT.
- 1.4 During this twelve month reporting cycle (1 April 2013 to 31 March 2014), 573 complaints were received and 91 pieces of positive feedback were logged.
- 1.5 Since we started logging complaints, we have seen generally seen an increase in the number of complaints logged year on year. This increase is attributed to several factors, including an increase in the size of the Register and more contact with registrants. Communication with employees to ensure that complaints are identified and logged centrally has also been a key factor in the year on year increases.
- 1.6 The following graph shows the monthly distribution of complaints logged from January 2006 to March 2014. We usually receive a considerable amount of feedback when a profession renews its registration. The graph maps the complaints received over a two-year period to reflect each profession's renewal cycle and to allow comparisons to be made.

1.7 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 Registration, Fitness to Practise and Finance. For example, during the review period the Registration team received 17,686 new UK applications, 3,574 international applications and 5,077 temporary applications. 3,122 CPD profiles were received and 155,781 telephone calls were answered. Cumulatively, these tasks resulted in 2,953,079 individual transactions carried out in the department. In comparison with the number of transactions completed, the HCPC receives a relatively small number of complaints.

Distribution of complaints received across two year cycles



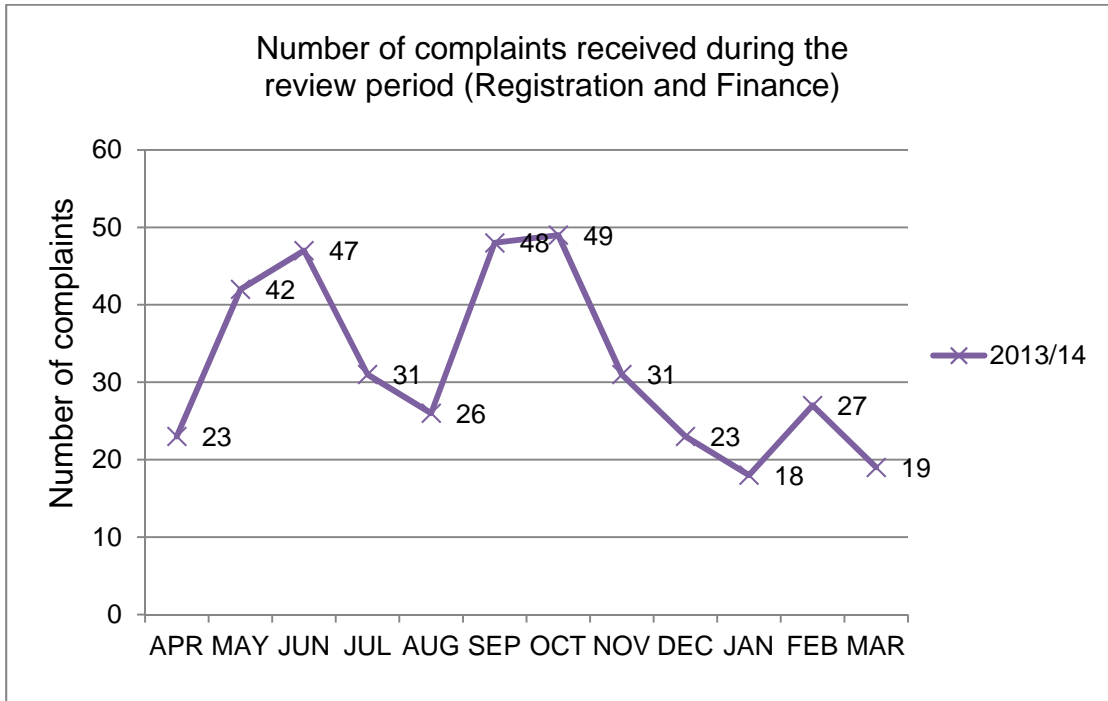
1.6 During the review period (1 April 2013 to 31 March 2014) there was a peak in the number of complaints received between May and July 2013 and between September and November 2013. The first peak relates to the closing of the practitioner psychologist renewal window and subsequent readmission. A larger number of complaints are received across the summer months about the UK application process as this is the peak time for processing applications from new graduates. The second peak relates to the closing of the renewal window and subsequent readmission for orthoptists, paramedics, clinical scientists, prothetists / orthotists, speech and language therapists, occupational therapists and biomedical scientists. This is the largest number of different professions in renewal at any one time during the two year renewal cycle.



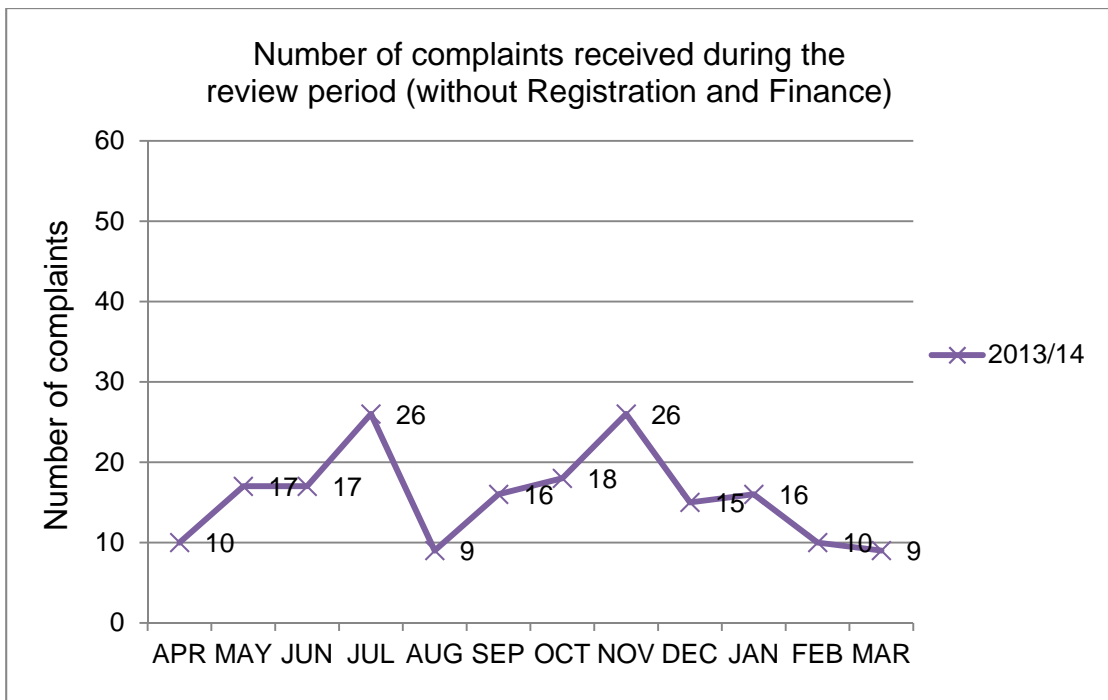
1.7 The table below shows the number of complaints received in the last six financial years.

Financial year	Number of complaints
2006/7	137
2007/8	160
2008/9	257
2009/10	235
2010/11	221
2011/12	207
2012/13	601
2013/14	573

1.8 The graph below shows the distribution of complaints received in the review period for the Registration and Finance departments. Due to the nature of the work in these departments and the renewal cycles, the amount of complaints received varies more across the year than in other departments.



1.9 The graph below shows the distribution of complaints received in the review period in all departments in the organisation except Registration and Finance. The number of complaints received is more consistent across the year.



2.0 Customer service policy – response times

- 2.1 The HCPC aims to address complaints in a timely manner and, as such, we aim to acknowledge complaints within three working days and provide a full response within fifteen working days.
- 2.2 During the review period we received and responded to 573 complaints. We responded to 530 complaints within our service level of 15 working days, which represents 92 per cent of complaints received.
- 2.3 There are occasions when a complainant may not be sent a full response within 15 working days. This may be due to the complaint requiring a detailed investigation, legal advice or the complaint being based on the outcome of another ongoing process; in such cases, the complainant will be kept informed by the Service and Complaints Manager of the progress of their complaint.

3.0 Number of complaints responded to by department & profession

3.1 During the review period we logged 573 complaints. The table below shows how many complaints each department responded to.

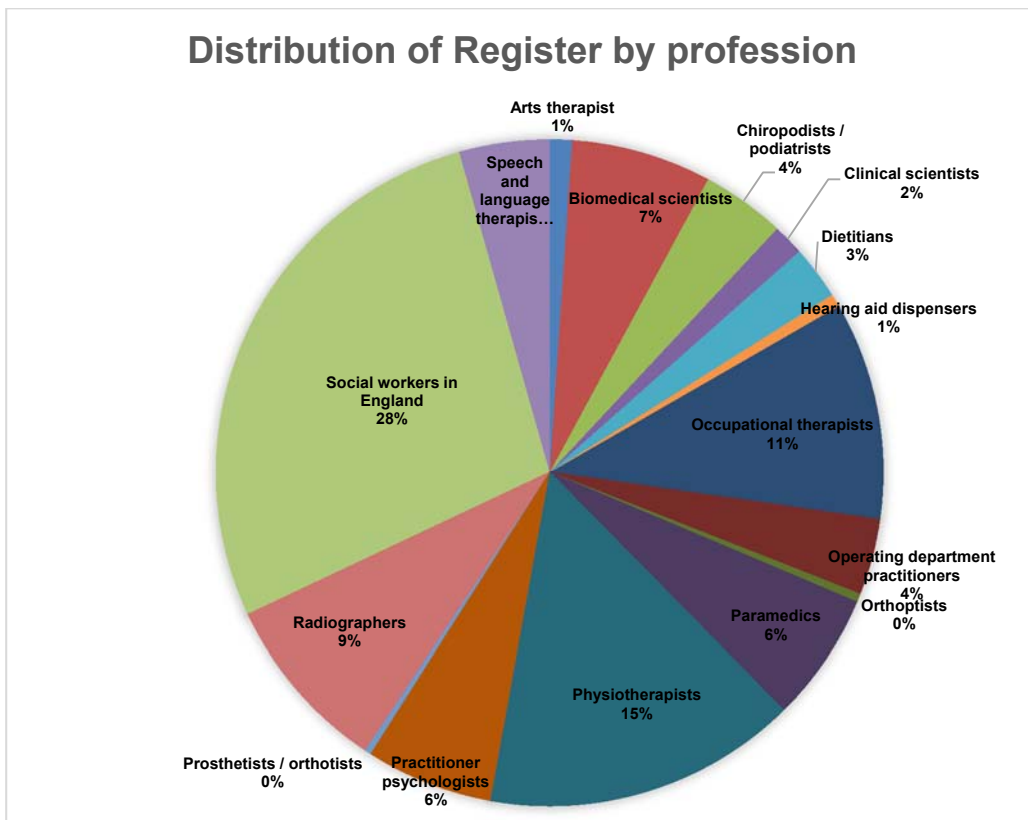
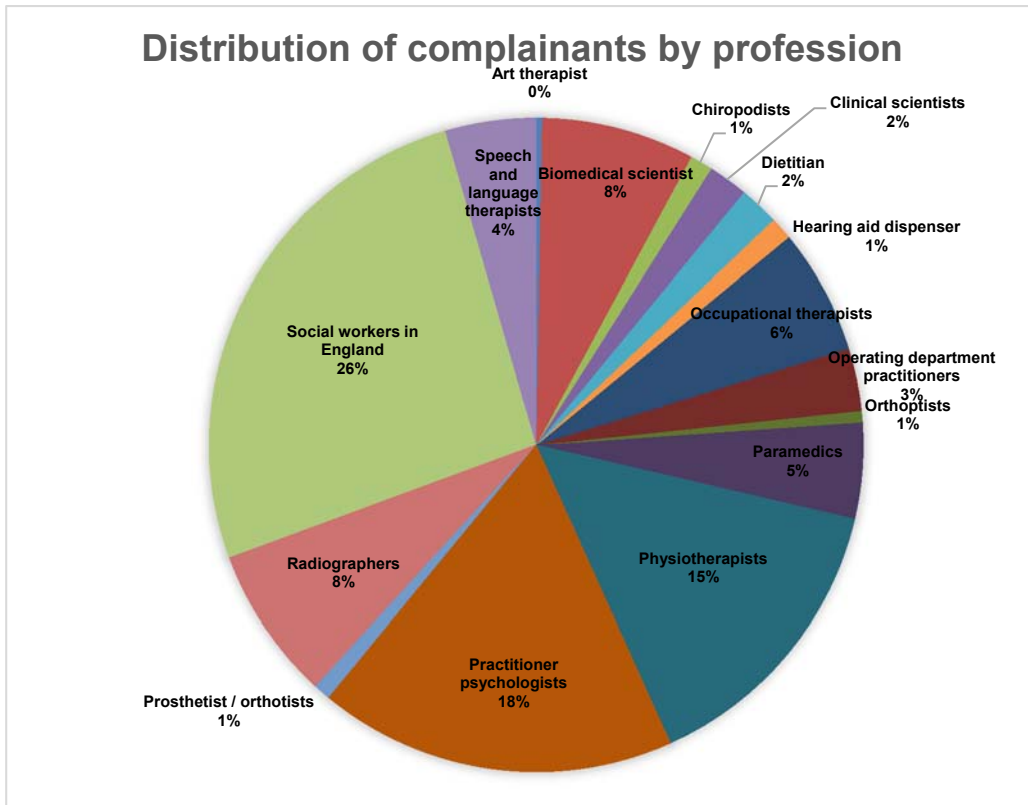
Department	Number of complaints
Registration	337
Fitness to Practise	159
Finance	47
Chief Executive	7
Communications	6
Secretariat	6
Education	5
Policy and Standards	3
Partners	3

3.2 During the review period, we received 356 complaints from registrants and applicants where we were able to identify their profession. The highest number of complaints received were from social workers. The following table and graph show the breakdown of complaints received from registrants by profession.

Profession	Total	Number per 1,000 registrants
Art therapists*	1	0.29
Biomedical scientists*	27	1.24
Chiropodist / podiatrists	4	0.31
Clinical scientists*	7	1.43
Dietitians	7	0.84
Hearing aid dispensers	4	2.00
Occupational therapists*	22	0.65
Operating department practitioners	11	0.93
Orthoptists*	2	1.52
Paramedics*	17	0.85
Physiotherapists*	52	1.06
Practitioner psychologists*	63	3.17
Prosthetists / orthotists*	3	3.16
Radiographers*	27	0.97
Social workers in England	93	1.05
Speech and language therapists*	16	1.14

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

3.3 The graphs below shows the distribution of complaints logged by profession and the distribution of the Register by profession.



3.3 The table below shows the distribution of complainants' professions and the distribution of the profession in proportion to the whole Register. For most professions, the percentage of total complaints received from a profession was broadly comparable to their percentage size on the Register. For example social workers are 27.63% of the entire Register and 26.12% of complaints were from social workers.

	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapist*	0.28	1.07	0.26
Biomedical scientists*	7.58	6.80	1.11
Chiropodists / podiatrists	1.12	4.06	0.28
Clinical scientists*	1.97	1.52	1.30
Dietitians	1.97	2.60	0.76
Hearing aid dispensers	1.12	0.62	1.80
Occupational therapists*	6.18	10.59	0.58
Operating department practitioners	3.09	3.69	0.84
Orthoptists*	0.56	0.41	1.37
Paramedics*	4.78	6.24	0.77
Physiotherapists*	14.61	15.24	0.96
Practitioner psychologists*	17.70	6.18	2.86
Prosthetists / orthotists*	0.84	0.30	2.80
Radiographers*	7.58	8.67	0.87
Social workers in England	26.12	27.63	0.95
Speech and language therapists*	4.49	4.38	1.03

3.4 Three professions had a significantly different percentage number of complaints than percentage of the Register. Occupational therapists make up 10.59% of the Register and provided 6.18% of complaints, chiropodists make up 4.06% of the Register and provided 1.12% of the complaints.

3.5 Practitioner psychologists make up 6.18% of the Register and provided 17.70% of the complaints we logged during the review period.

3.6 Some of the smaller professions, (arts therapists, hearing aid dispensers and prothetists / orthotists) had a very significant difference in complaint ratios, however this may not be an accurate reflection due to the size of the professions and the small number of complaints.

4.0 Summary of complaints received

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	33	<ul style="list-style-type: none"> • Payment issues (mainly social workers) • International applications - time taken to process forms 	Registration - 19 Fitness to Practise - 7 Finance - 4 Communications - 1 Policy and Standards - 1 Secretariat - 1	96%	HCPC 52% Reg 22% N/A 26%
May	60	<ul style="list-style-type: none"> • Employer renewal reminder letters - letters sent to employers asking them to remind their employee to renew their registration • Renewal process • Online renewal portal issues 	Registration - 38 Fitness to Practise - 12 Finance - 4 Communications - 3 Chief Executive - 2	96%	HCPC 20% Reg 10% N/A 70%
June	64	<ul style="list-style-type: none"> • Employer renewal reminder letters - letters sent to employers asking them to remind their employee to renew their registration • Online renewal portal issues 	Registration - 43 Fitness to Practise - 14 Finance - 4 Education - 1 Partners - 1 Policy and Standards - 1	100%	HCPC 40% Reg 4% N/A 56%
July	57	<ul style="list-style-type: none"> • UK application form processing - time taken to process forms 	Registration - 29 Fitness to Practise - 20	93%	HCPC 22%

		<ul style="list-style-type: none"> • New health and character declarations on renewal forms • International applications - time taken to process forms 	Chief Executive - 3 Education - 2 Finance - 2 Partners - 1		Reg 8% N/A 70%
August	35	<ul style="list-style-type: none"> • UK application form processing - time taken to process forms • New health and character declarations on renewal forms 	Registration - 22 Fitness to Practise - 7 Finance - 4 Partners - 1 Secretariat - 1	94%	HCPC 45% Reg 0% N/A 55%
September	64	<ul style="list-style-type: none"> • Online renewal portal issues - time taken to receive codes • New health and character declarations on renewal forms • International applications - time taken to process forms 	Registration - 45 Fitness to Practise - 15 Finance - 3 Education - 1	94%	HCPC 41% Reg 8% N/A 51%
October	67	<ul style="list-style-type: none"> • UK and readmission forms - time taken to process form. • International applications - time taken to process forms 	Registration - 42 Fitness to Practise - 16 Finance - 7 Communications - 1 Secretariat - 1	93%	HCPC 42% Reg 0% N/A 58%
November	57	<ul style="list-style-type: none"> • UK registration - customer service and processing errors • Finance - intermediate removal for missed payments • FTP - pre-ICP process and decisions 	Fitness to Practise - 23 Registration - 20 Finance - 11 Chief Executive - 2 Secretariat - 1	86%	HCPC 25% Reg 2% N/A

					73%
December	38	<ul style="list-style-type: none"> • Online renewal portal issues • Readmission process issues • FTP - pre-ICP process and decisions 	Registration - 20 Fitness to Practise - 13 Finance - 3 Education - 2 Secretariat - 1	84%	HCPC 34% Reg 8% N/A 58%
January	34	<ul style="list-style-type: none"> • UK registration - customer service • International applications - time taken to process forms • FTP - pre-ICP process and decisions 	Registration - 17 Fitness to Practise - 15 Finance - 1 Secretariat - 1	85%	HCPC 42% Reg 6% N/A 52%
February	37	<ul style="list-style-type: none"> • Online renewal portal issues • CPD process • FTP - pre-ICP process and decisions 	Registration - 24 Fitness to Practise - 8 Finance - 3 Communications - 1 Policy - 1	86%	HCPC 30% Reg 6% N/A 64%
March	28	<ul style="list-style-type: none"> • Online renewal portal issues • CPD process • FTP - pre-ICP process and decisions 	Registration - 18 Fitness to Practise - 9 Finance - 1	96%	HCPC 29% Reg 7% N/A 64%

Total number of complaints: 573

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. Last year, a large amount of feedback that we received related to the transfer of social workers in England to the HCPC Register, this year the HCPC did not experience such a significant event and therefore the topics of feedback are broader.

5.2 Registration fees and payment issues – social workers; by the beginning of the review period, most of the previous issues relating to the transfer of social workers to the HCPC Register and the closure of the General Social Care Council (GSCC) had been dealt with, however we did continue to receive a smaller amount of feedback from social workers related to registration fees and payments, complaints were received about:

- The GSCC allowed registrants to remain registered if they had missed a registration fee payment and collected missed payments within their renewal process. We do not operate such a system. If a registrant misses a payment they are contacted directly and asked for a replacement payment and to arrange future payments, they are liable to be removed from the Register if they do not keep up to date with payments. This is a notable change of system for social workers.
- The GSCC was heavily subsidised by the government, and charged a registration fee of £30 per year. Some social workers complained that the HCPC registration fee is significantly more.
- Some social workers had general complaints and queries about the schedule of their registration fee direct debit payments.

5.3 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. Complaints have been received about:

- The necessity to complete and return a readmission form;
- The 10 working day service level for processing a readmission form
- Application forms being returned for additional information rather than contacting applicants directly for information.

5.4 Online renewal portal – registrants are encouraged to use the portal to keep their personal details up to date and to renew their registration. Complaints have been received about:

- Arrangements for the generation of security codes for accessing the online portal.
- The online renewal portal interface.

- 5.5 International application process – the process consists of submission of an application form, submission of supporting documentation, payment, and qualification and verification checks. Complaints have been received about:
- Time taken to process application forms
 - Time taken to complete the verification process
 - EEA mutual recognition
- 5.6 Employer reminder letters – the employer reminder letter is sent to registrant's employers two weeks before the end of the renewal window if a registrant has not renewed their registration; this allows the employer to remind the registrant about renewing. Complaints have been received about:
- Writing to employers
 - The tone and content of letters
- 5.7 Intermediate removal – the intermediate removal process is run if registrants do not maintain their registration payments. Registrants are written to twice to ask them to make a payment and they are removed from the Register if this payment is not made. Complaints have been received about:
- Contacting registrants regarding payments - not telephoning or emailing registrants about missed payments.
 - The necessity to complete and return a readmission form.
- 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 a Panel. Complaints have been received about:
- Not deeming a concern/s to have reached the standard of acceptance.
- 5.9 An explanation and examples of corrective action are given in Section 7.

6.0 Root cause of complaints

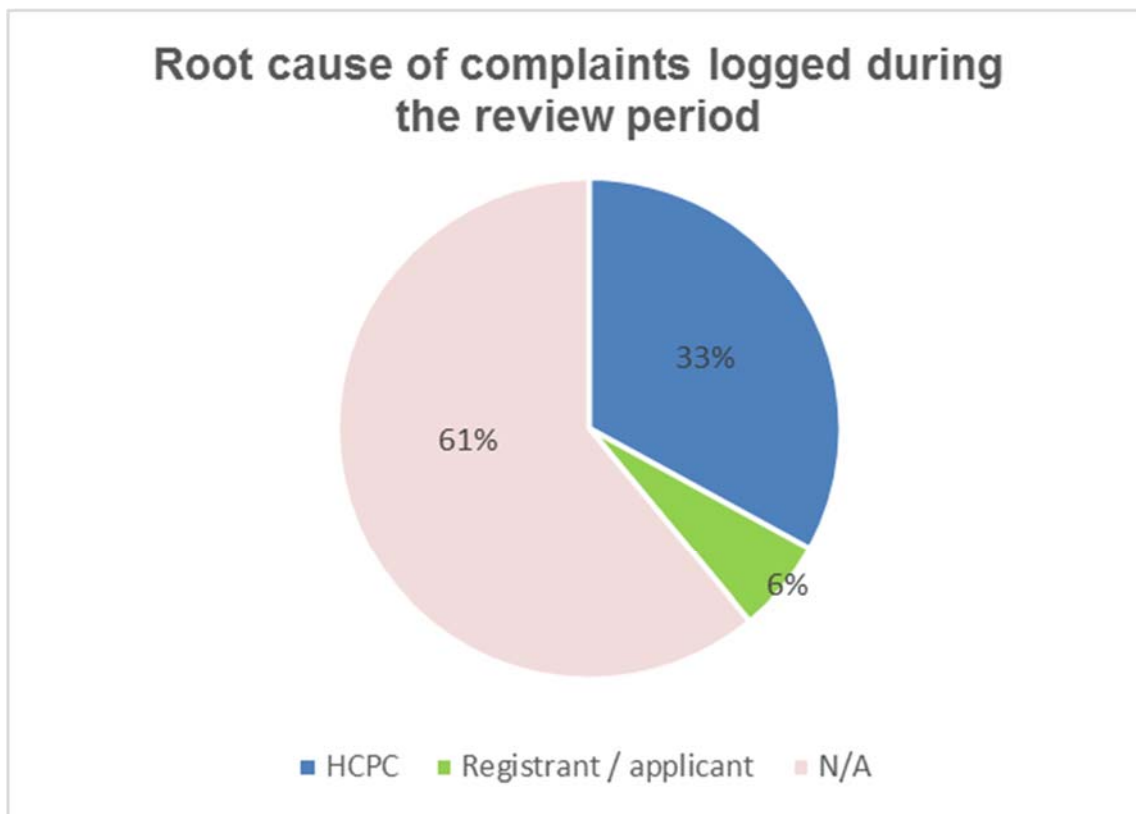
6.1 To help HCPC identify where there may be problems with processes or policies, complaints are classified according to where the error that caused the complaint occurred.

6.2 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 or regulation of new professions.

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

- HCPC – 168 complaints
- Registrant / applicant – 31 complaints
- N/A – 306 complaints



6.4 The graph above shows the distribution of complaints within the three root cause categories. This distribution is roughly in line with last years (2012/13) which was:

- HCPC - 26%
- Applicant / registrant - 9%
- N/A - 65%

6.5 The slight drop in the percentage of “not applicable” complaints this year can be attributed to the very high number of complaints received during the last review period about registration fees from social workers.

7.0 Corrective action

7.1 The HCPC has numerous ways in which it identifies that corrective action may be required. The assessment of the root causes of the complaints we receive is one of these ways. Other ways include:

- periodic reviews of our systems and processes
- commissioning research
- seeking feedback from registrants through surveys
- learning from factors affecting the wider regulatory agenda such as reviews of audit reports undertaken by the PSA or national inquiries (for example, the Francis and Clwyd/Hart Reports)

7.2 The feedback and complaints process is an opportunity to learn from stakeholder feedback and ensure continuous improvement.

7.3 The majority of complaints (61%) that were received during the review period were not due to an HCPC error.

7.4 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.

7.5 As an organisation the HCPC starts by trying to correct any errors that have been identified in a complaint. For example, if an application form has been returned incorrectly, the form can be returned to a named individual and processed on receipt.

7.6 In complaints that the HCPC were at fault in, the majority of mistakes were due to human error. In these cases, additional training and mentoring was usually the most appropriate corrective action.

7.7 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 emails when necessary changes have been identified.
- Registration scanning software system upgrade to prevent incorrect changes to personal details.
- Extra quality checks for filing of international application forms.
- Changed telephone call recorder provider and storing calls for longer to allow access to this information and for use in training.

- Registration certificates are generated twice a week to ensure they reach registrants more quickly.
- Authentication and activation codes for the online renewal portal are now generated by letter rather than re-issuing a certificate; this is to ensure that the codes reach registrants more quickly, to avoid confusion about which codes to use and to save money on printing and mailing costs.
- Feedback received from registrants about the online renewal portal is being logged to feed into a review.
- A dedicated section on the main 'customer service' webpage explaining when the HCPC can and cannot assist with a complaint about a FTP decision.
- Clearer and more accessible information about the Standard of Acceptance Policy on the FTP web pages.
- Development of a process to receive feedback from representative bodies and to ensure it is responded to appropriately and if necessary action taken. This includes a clear escalation policy and a dedicated email address.

7.8 A Registration system and process review will be initiated during this financial year and a project to review and improve the online renewal portal is underway.

8.0 Positive feedback

8.1 It is essential to log positive feedback that HCPC receives alongside complaints to ensure that a balance is achieved between areas that could be improved and current achievements. During the review period we logged 91 pieces of positive feedback. These included cards, letters and emails thanking employees for many contributions. Positive feedback was received for various departments throughout the HCPC, for a huge range of activities.

8.2 Examples of positive feedback received included praise from registrant's thanking Registration advisors for help with the international application process and stakeholders thanking members of the Policy and Standards department for giving presentations at various events. The following are a small number of examples of comments that stakeholders have made.

- A complainant thanked a manager for his "very full and frank" response to her complaint, she commented that she was "very impressed that the HCPC took the time and trouble to investigate".
- A delegate at a workshop thanked employees for their presentations on CPD which were "helpful and informative".
- Another regulator thanked employees for travelling to meet them and share information about HCPC policies and processes.

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

Review period	Number 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

9.0 Conclusion

- 9.1 The number of complaints logged this year was in line with last year, with a slight decrease in the number of complaints logged.
- 9.2 In contrast to last year, complaints received were fairly balanced across the professions on the Register.
- 9.3 Overall, the HCPC receives a relatively small number of complaints relative to the number of transactions that are carried out across the organisation.
- 9.4 Over the last year, the HCPC's policy and complaints process has been updated, the website has been amended to reflect this and to provide further guidance to complainants. We have put an even stronger emphasis on corrective action within the last year, with regular review meetings with managers to look at complaint reporting and identify areas to improve.
- 9.5 We have continued to receive a large amount of positive feedback in the last year.
- 9.6 The next report will cover the period 1 April to 30 September 2014. Reports will be on six monthly basis going forward.