Council 3 December 2015

Six monthly review of feedback and complaints

Executive summary and recommendations

Introduction
Since 2004 the Health and Care Professions Council (HCPC) has operated a feedback and complaints function. 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 April 2015 and 30 September 2015. 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 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
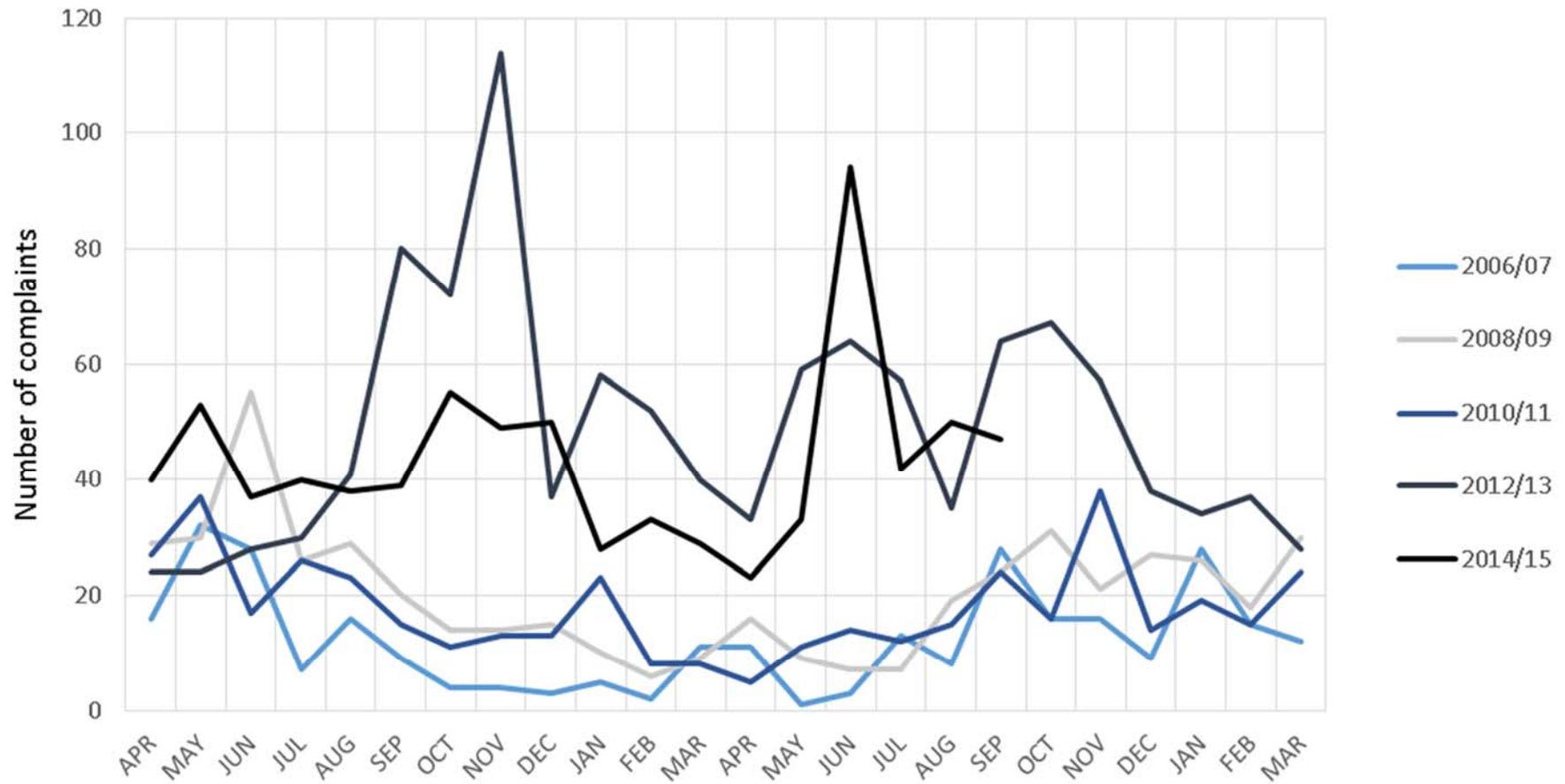None

Appendices
None
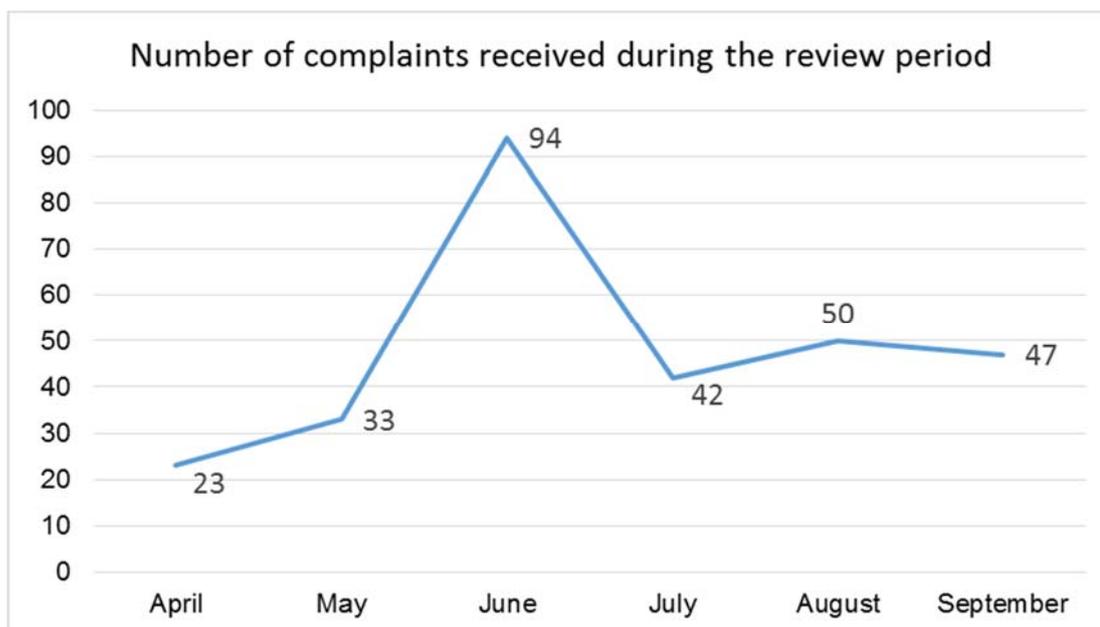
Date of paper
24 November 2015

1.0   Background information

1.1   The Health and Care Professions Council (HCPC) has operated a complaints and feedback function since 2004. The role is carried out by the Service and Complaints Manager in the Secretariat who 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. 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 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 Service and Complaints Manager prepares a monthly report for the Executive Management Team 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 six month reporting cycle (1 April to 30 September 2015), 289 complaints and 33 pieces of positive feedback were logged.

1.5   Since we started logging complaints, we have 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. Continued 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 September 2015. 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.

Number of complaints receieved across two year cycles

1.7 In June 2015, there was a peak in the number of complaints. This corresponded with the announcement that the fees that we charge were going to change. Eight 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

	April	May	June	July	August	September
	23	33	94	42	50	47

1.8 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	**578***	**289**	

*projected – based on complaints received to September

1.9 The table below shows the number of complaints received in the last nine financial years with the number of complaints per 1,000 registrants. The table shows that the number of complaints received peaked during financial year 2012-13, which is when social workers joined the HCPC Register.

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	**578***	1.70*

*projected – based on complaints received to 30 September

1.10 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. The HCPC receives relatively few complaints compared with the number of registrants and the number of transactions carried out. During the review period, 289 complaints were logged, if we receive this number of complaints in the next reporting period, this would be 1.70 complaints for every 1,000 registrants.

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 289 complaints. We responded to 250 complaints within our service level of 15 working days, which represents 87 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 complexity of the complaint requiring a more 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.

2.4   The Executive Management team have recently had discussions about whether our service level for responding to complaints remains appropriate. We will be reviewing our approach in this area as part of a wider review over the coming months.

3.0 Number of complaints received by department and profession

3.1 During the review period we logged 289 complaints. The table below shows how many complaints each department responded to.

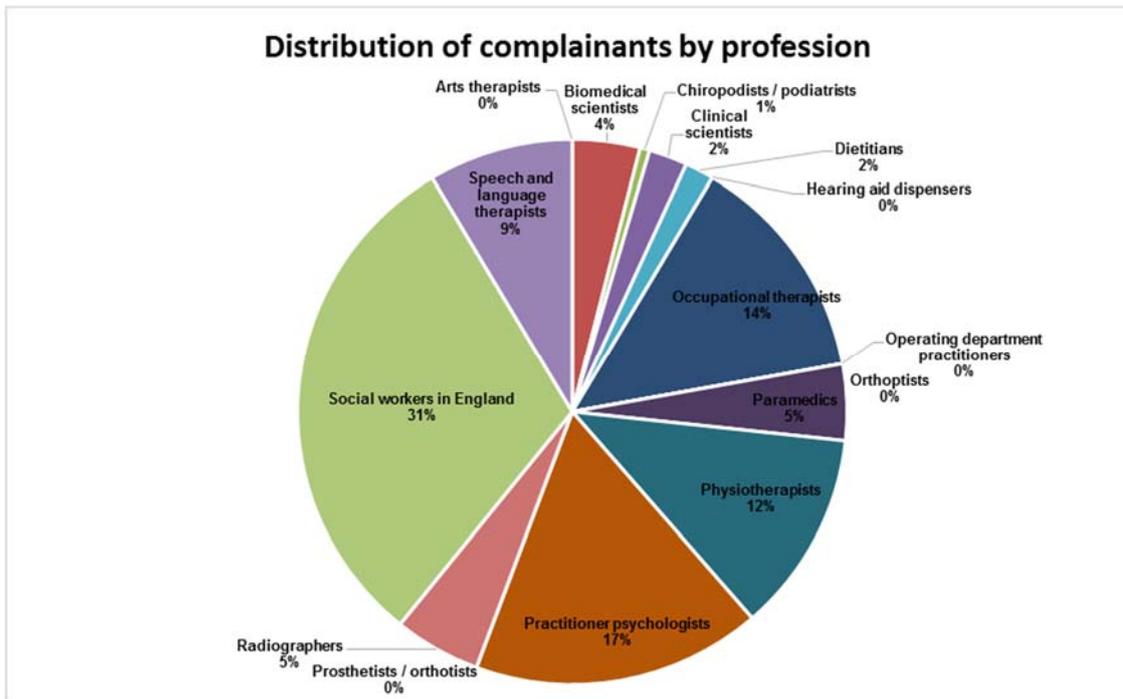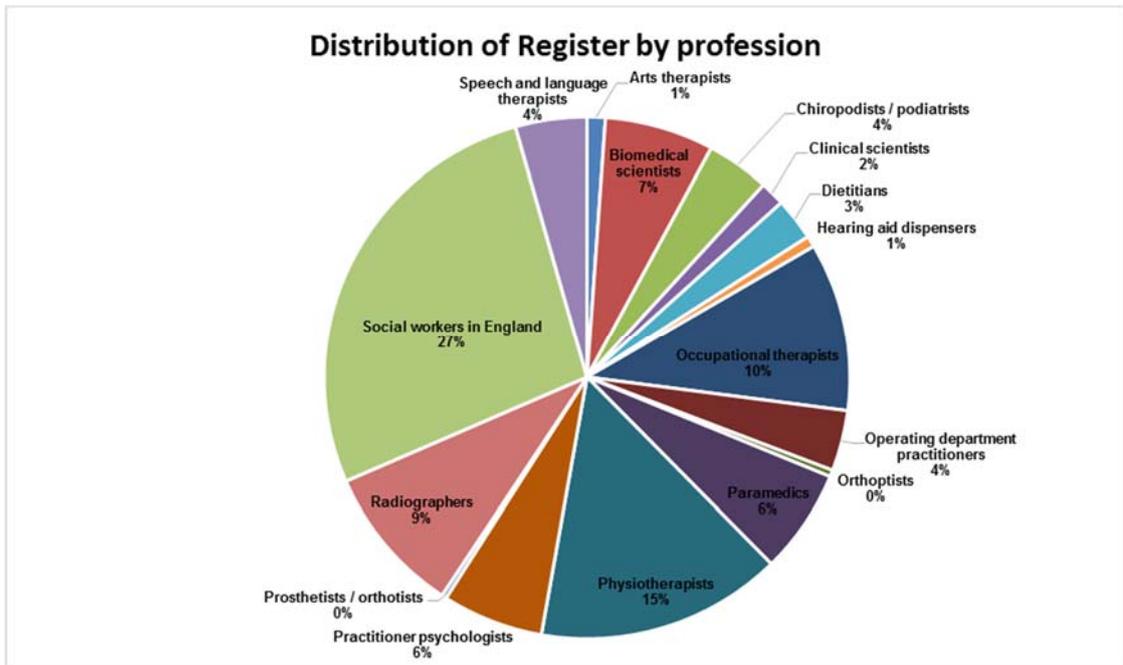| Department	Number of complaints
Finance	6
Fitness to Practise	92
Partners	1
Policy and Standards	1
Registration	104
Secretariat	85*
Total	**289**

*includes 82 fee increase complaints

3.2 During the review period, we received 176 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	0	0.0
Biomedical scientists*	7	0.3
Chiropodists / podiatrists	1	0.1
Clinical scientists*	4	0.8
Dietitians	3	0.3
Hearing aid dispensers	0	0.0
Occupational therapists*	24	0.7
Operating department practitioners	0	0.0
Orthoptists*	0	0.0
Paramedics*	8	0.4
Physiotherapists	21	0.4
Practitioner psychologists*	30	1.4
Prosthetists / orthotists*	0	0.0
Radiographers	9	0.3
Social workers in England	54	0.6
Speech and language therapists*	15	1.0

*Denotes that the profession was in renewal 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.

Distribution of Register by profession

Distribution of complainants by profession

3.4   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. There are two distinct groups who provided more feedback than others, practitioner psychologists and speech and language therapists.

3.5   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.

	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapists	0	1.1	0
Biomedical scientists*	4.0	6.7	0.6
Chiropodists / podiatrists	0.6	3.9	0.1
Clinical scientists*	2.3	1.5	1.5
Dietitians	1.7	2.6	0.6
Hearing aid dispensers	0	0.7	0
Occupational therapists*	13.6	10.5	1.3
Operating department practitioners	0	3.8	0
Orthoptists*	0	0.4	0
Paramedics*	4.5	6.4	0.7
Physiotherapists	11.9	15.1	0.8
Practitioner psychologists*	17.0	6.2	2.7
Prosthetists / orthotists*	0	0.3	0
Radiographers	5.1	9.2	0.6
Social workers in England	30.7	27.1	1.1
Speech and language therapists*	8.5	4.4	1.9

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

3.6   No complaints were logged from art therapists, hearing aid dispensers, operating department practitioners, orthoptists, or prosthetists and orthotists. These are some of the smallest professions in terms of registrant numbers. It is worth noting that 8 of 16 professions were in renewal at some point during the review period.

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	23	• UK registration – registration issues • International registration – progress of application • FTP – decisions not to progress complaints to an Investigating Committee Panel	Finance - 1 Fitness to practise - 14 Registration - 8	78%	HCPC 26% Reg 4% N/A 70%
May	33	• UK registration – registration renewal (practitioner psychologists) • International registration – verification process	Fees - 2 Finance - 3 Fitness to Practise - 10 Policy and Standards - 1 Registration - 16 Secretariat - 1	88%	HCPC 24% Reg 9% N/A 67%
June	94	• Registration renewal fee increase	Fees - 61 Finance - 1 Fitness to Practise - 13 Registration - 19	94%	HCPC 9% Reg 4% N/A 87%

July	42	• Registration renewal fee increase	Fees - 8 Finance - 1 Fitness to Practise - 18 Registration - 14 Secretariat - 1	79%	HCPC 14% Reg 5% N/A 81%
August	50	• Registration renewal fee increase • FTP – decisions not to progress complaints to an Investigating Committee Panel	Fees - 10 Fitness to Practise - 15 Partners - 1 Registration - 23 Secretariat - 1	84%	HCPC 26% Reg 0% N/A 74%
September	47	• International registration – processing timescales • FTP – decisions not to progress complaints to an Investigating Committee Panel	Fees - 1 Fitness to Practise - 22 Registration - 24	87%	HCPC 28% Reg 7% N/A 65%

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. 82 complaints were received about the organisation's fee increase; this is discussed separately in section 6.

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 renewal reminder letters and employer reminder letters, both in sending a letter to employers and the content and tone of the correspondence.
- 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.
- 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. The number of complaints we have received about the international and EEA application processes seems to have fallen in recent years with more issues around the timeliness of assessors responses than the administrative side of the process. Outside of complaints relating to person 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 (more communication from the Registration department with the assessors and re-writing of assessments have meant that sometimes processing times have increased in an effort to ensure a higher quality of assessment document is sent to the applicant).
- Availability of assessors to respond to questions from applicants.
- Some applicants had no concerns about the process, but were unhappy with the outcome of their application.

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:

- HCPC not deeming a concern or concerns to have reached the standard of acceptance.

5.9　An explanation and examples of corrective action are given in Section 7.

6.0 Registration fee increase

6.1 Following a consultation with stakeholders that ran between March 2015 and May 2015, the Council decided to raise registration fees. The consultation covered proposals for changes to all the fees that the HCPC charges applicants and registrants, including the application and readmission fees. The annual registration (renewal) fee came under most scrutiny from registrants.

6.2 One of the major unions asked its members to write to their MP and to the HCPC about the registration fee. Most registrants who complained used this as a basis for their complaint, there were three main points:

- The increase in the registration fee may be disproportionate to the increase in registrant's salaries and the cost of living;
- Many registrant respondents to the consultation disagreed with the proposal to increase fees; and
- That the increase came about less than two years after a previous increase.

6.3 The annual registration fee increase was £10 per year. Some registrants expressed concerns that in this financial climate, an increase of £10 would result in a noticeable reduction in their disposable income. Other registrants disagreed with the principle of an increase, regardless of the amount.

6.4 In responding to these complaints, we provided a broader overview to the registration fee increase and addressed some misconceptions that had become apparent. Each response was tailored to the individual, generally our responses provided a background to the consultation and decision making of the Council regarding the fee rise; an explanation of why the increase in fees was necessary including details of the Professional Standards Authority for Health and Social Care (PSA) levy and an explanation of our fee review process.

6.5 Responses addressed individual's other questions and concerns, made registrant's aware that they could claim the tax back on their registration fees and explained the benefits of registration.

7.0 Root cause of complaints

7.1 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.
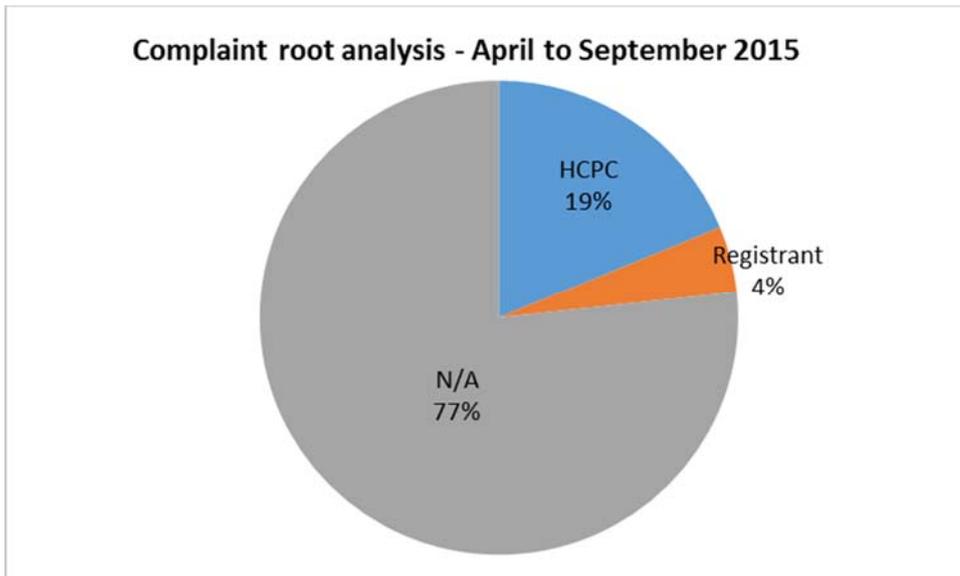
7.2 Three groups are used to classify complaints, they are:

- 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, regulation of new professions or the correct application of an HCPC policy.

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

- HCPC – 19%
- Registrant / applicant – 4%
- N/A – 77%

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

Complaint root analysis - April to September 2015

HCPC 19%

Registrant 4%

N/A 77%

8.0   Corrective action

8.1   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)

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

8.3   The majority of complaints (77%) 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.

8.4   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.

8.5   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.

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

8.7   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 where necessary changes have been identified. This applies particularly in departments that have more interactions with stakeholders including Fitness to Practise and Registration.

- Changes to the quality check system for processed application forms in the Registration Department.
- Feedback from complaints are fed into meetings with our suppliers regarding handling of Fitness to Practise cases.
- Reviewing telephone calls related to a complaint to ensure that the information provided is correct.
- Feedback on specific issues to employees after the conclusion of a complaint.
- 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, including email workshops and international application workshops.
- Re-writing of key pieces of renewal reminder correspondence in response to registrant and employer comments about the content and tone of the letters.

8.8 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:

- Changes to the timing of our renewal reminder letters to ensure the most efficient use of resources.
- Communication preferences to include greater use of email and SMS.
- Options on our systems for any person that may require different or adapted access to allow them to complete processes online.

9.0   Positive feedback

9.1   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 33
        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.

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

- Positive feedback for members of the Education department for their
  involvement in training from visitors who commented that they "were
  engaging and knowledge and a wonderful representation of HCPC".
- Positive feedback for FTP staff involved in hearings on the day that
  there was a flood in Kennington "Hearings Officer worked very hard to
  ensure everything went smoothly and everyone knew what was
  happening… They kept everyone informed of what was happening,
  and contacted all participants".
- Positive feedback from a registrant "thank you for your efficiency and
  prompt actions ref my now completed retirement... It has been a
  pleasure to be a member of HCPC".

9.3   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	33	n/a

10.0   Conclusion

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

10.2   The distribution of complaints received was more balanced across the professions than in previous reporting cycles.

10.3   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.

10.4   Overall, the HCPC receives a relatively small number of complaints relative to the number of transactions that are carried out across the organisation. The number of transactions continues to increase with the size of the Register. The number of complaints received continues to be in line with previous reporting periods.

10.5   We continued to put a strong emphasis on corrective action within the reporting period, with complaints feeding into training and project work. We continue with regular review meetings with managers to look at complaints and feedback to identify areas for improvement.

10.6   The next report will cover the period 1 October 2015 to 31 March 2016.