

Communications Committee 8 November 2011

Review of consultation methodology and analysis

Executive summary and recommendations

### **Introduction**

Under the Health Professions Order we must consult with appropriate stakeholders before establishing any standards or guidance. In 2008, we undertook a review of the consultation processes that have taken place since we took over the regulatory functions of the Council for Professions Supplementary to Medicine (CPSM) in 2002. We have recently finished a review of the consultations that took place since 2008.

Effective consultation is vital in ensuring that the standards and guidance we produce are appropriate. The review allows us to reflect on previous work, identify good practice amongst other regulators and set out any actions we can take to improve our processes.

### **Decision**

The Committee is invited to discuss and agree the paper.

### **Background information**

None.

### **Resource implications**

The resource implications of implementing this review are incorporated within the workplan for 2011-2012 and will be incorporated within the following year's workplan.

### **Financial implications**

The financial implications implementing this review are incorporated within the budget for 2011-2012 and will be incorporated within the following year's budget.

### **Appendices**

None

### **Date of paper**

26 October 2011

---

## Review of consultation methodology and analysis

### Contents

1. Background .....	2
About this review .....	2
2. Previous consultation review .....	3
3. The consultation process .....	4
Consultation list .....	4
Consultation format .....	4
Consultation timeframes .....	4
Analysing the consultations .....	5
Recent changes to the consultation process .....	5
4. Completed consultations .....	6
Response rates .....	9
5. Other regulators' consultation processes .....	10
Publicising consultations .....	10
The role of consultation .....	10
Accessibility .....	10
Collating consultation feedback .....	10
6. Recommendations .....	12
Publicising consultations .....	12
Recommendations .....	12
Consulting widely .....	13
Recommendations .....	14
Collating consultation responses .....	14
Recommendations .....	15
Continuous improvement .....	15
Recommendations .....	16
7. Implementation .....	17

# 1. Background

- 1.1 Under The Health Professions Order 2001, we must consult with appropriate stakeholders. Article 3 (14) states:

*“Before establishing any standards or giving any guidance under this Order the Council shall consult representatives of any group of persons it considers appropriate”.*

- 1.2 Consultation is a key area of our strategic intent. It helps us to improve the organisation continually; influence the regulatory agenda and respond to registrants’ concerns. Consulting is also one way that we adhere to some of our guiding principles: to communicate and respond, and work collaboratively. Corporate governance and good decision-making are closely linked to the consultation process.
- 1.3 Openness and transparency is another part of our strategic intent that links into our consultation process. We consider the expertise and experiences of our stakeholders as vital in ensuring we remain open and transparent in our decision-making. Consultations form an integral part of this decision-making. This allows us to set out our preliminary intentions to all interested stakeholders. In return, we can make informed, evidence-based decisions by taking account of the views of a variety of people and organisations. This leads to better policies and reduces the risks of policies either failing to meet their objectives or having unintended consequences.
- 1.4 Effective consultation is vital when setting standards for our registrants to meet. The standards that we set must be set at the appropriate level and reflect appropriate expectations of our registrants. We often set up working groups involving members of the relevant profession to help us to draft standards. The working group is designed to be as representative of the profession as is possible. However, the consultation process allows us to reach more widely across the profession and seek the views of any stakeholders affected by our proposals. In doing so, consulting allows us to check that the standards we are setting are at an appropriate level, reflect existing practice and set appropriate expectations.

## About this review

- 1.5 In 2008, we undertook a review of the consultation processes that have taken place since we took over the regulatory functions of the Council for Professions Supplementary to Medicine (CPSM) in 2002.
- 1.6 This review looks at the consultations that have taken place since 2008. It explains the rules and guidelines we follow and the processes we have used. There is a list of all consultations with detail on the responses. The paper also draws out the lessons we have learnt from consulting and provides action points for future development.

## 2. Previous consultation review

2.1 The previous review of the consultation process looked at consultations run between 2002 and the end of 2007. We made a number of recommendations following the review. The recommendations are set out below.

- Appoint a consultation co-ordinator within the Policy and Standards department.
- We should manage the consultation list proactively so that we can identify relevant organisations promptly.
- Collect stakeholder email addresses and use to send emails when we launch a new consultation.
- Consider how to consult with individuals who are not members of a professional body, association or union.
- Publicise consultations in the HPC newsletter, on the website and at relevant external events.
- Revise the consultation section of the website to provide more information about the consultation process.
- Ensure that the consultation document is available in alternative formats (such as braille) on request and consider whether it would be appropriate to publish the consultation document in different ways (e.g. in different languages).
- Consultation documents over five pages long should contain an executive summary, a reference to the Cabinet Office code of practice for consultations and information on when we will publish the outcomes of the consultation.
- We should ask respondents how we could improve the consultation process.
- We should monitor the effectiveness of consultations on an on-going basis, and consider both the response rates and how the consultation responses clarified the policy options and affected the final decision.
- We should include information about the consultations we run within the annual report.

2.2 We have implemented a number of these recommendations. For example, we regularly update the consultation list and include email addresses where available. We now email relevant stakeholders when we launch a consultation, in addition to sending hard copies of the consultation documents. We have also revised the consultation documents to ask stakeholders for their feedback on the consultation and to make clear that the consultation document is available in alternative formats on request.

2.3 It has not been possible to implement some of the recommendations. For example, we have not included information about consultations in the annual report as the format of the report has changed. However, we now publish the consultation responses document alongside the original consultation document when the responses document is agreed so that stakeholders can easily find the document and see both the responses we received and the actions we have taken as a result.

### **3. The consultation process**

#### **Consultation list**

- 3.1 We currently have a consultation list of 450, all of which are organisations except for 12 individuals. The organisations include the professional bodies of the professions we currently regulate, the professional bodies for professions we may regulate in the future, health and social care organisations, appropriate government departments, and other regulators. We maintain the list, as we are responsible for the consultation process.
- 3.2 The consultation list is not the only list of contacts within HPC. We also use other department's lists of contacts. The Education department keep their own up-to-date list of education providers that they make available to us if the consultation relates to aspects of education. The partners manager also keeps a list of contacts that is also available when required.

#### **Consultation format**

- 3.3 We make consultations as accessible and widely available as possible. We do this by sending them to stakeholders on the consultation list and the lists held by other departments (when appropriate), and putting the details on the website. We also publicise consultations at different external events (listening events, employer events, and conferences), through the newsletter, and with press releases.
- 3.4 We always send consultations in hard copy (such as a letter or printed document). We ask respondents to reply in writing, unless it is not possible for the respondent to do so. We do this to make sure that the response is consistent with what the respondent wants to say, and so we have a record of responses. However, we will speak to respondents who are unable to make written responses and discuss reasonable adjustments to help them to respond (which could include taking their response over the phone).

#### **Consultation timeframes**

- 3.5 Consultations usually run for 12 weeks or more. This is consistent with HM Government Code of Practice on Consultation.<sup>1</sup> On occasion, we consult for longer than 12 weeks where we believe it would increase the number of responses. For example, the consultations on the standards of proficiency and threshold level of qualification for entry to the Register as a social worker in England are running for 4 months because the consultation period runs over the summer.
- 3.6 Sometimes however, we have to run consultations for less than 12 weeks. This happens rarely, on occasions when we need to consult stakeholders but cannot for operational reasons do so for the normal length of time. For example, the consultation on the grandparenting criteria for practitioner psychologists ran for 5 weeks so that the grandparenting criteria were ready prior to the regulation of practitioner psychologists.

---

<sup>1</sup> HM Government Code of Practice on Consultation <http://www.bis.gov.uk/files/file47158.pdf>  
Page 4 of 17

## **Analysing the consultations**

- 3.7 We receive all responses to the consultation, which we log, save and process. When a consultation ends, we analyse the responses and present a summary of these along with the key decisions we have made in light of the feedback from the consultation. The applicable committees and Council consider the consultation responses document before we publish the document on the website.
- 3.8 We currently analyse all responses manually. This process can be very labour intensive. The consultation on the statutory regulation of psychotherapists and counsellors for example, received 1,105 responses. We may improve the analysis process by using software to collate responses, particularly if we were to undertake large-scale consultations in the future.
- 3.9 We list organisations that responded to the consultation at the end of the document. However, responses from individuals are always anonymous. If it is unclear if a response is from an individual or an organisation, we always treat it as an individual response. This does affect the way we treat the response, but ensures we do not attribute any part of the response inaccurately.

## **Recent changes to the consultation process**

- 3.10 We have made several recent changes to the way that we carry out consultations.
- 3.11 In the past, we would include direct quotes from organisations that responded to the consultation within the consultation responses document and would often list which organisations made particular comments. This made the document long and less accessible. In addition, where a number of respondents made similar points it was only possible to include a quote from one respondent, rather than quoting all of their responses.
- 3.12 Now we provide a summary of the responses we have received, without identifying particular organisations. We continue to quote responses if appropriate. In this way, we can still reflect the comments we have received whilst making the responses document more accessible.
- 3.13 We have also recently introduced a word-based consultation response form. We have used this for the two most recent consultations that have closed. There is some difference in the usage rates between the two consultations.<sup>2</sup> It is difficult to identify reasons for the differences. However, it appears that respondents who want to make detailed comments use the consultation response form more often whilst respondents who have no detailed comments to make do not use the form.

---

<sup>2</sup> 65% of respondents to the consultation on our proposals for post-registration qualifications used the consultation response form. 40% of respondents to the consultation on our changes to the guidance on health and character used the response form.

## 4. Completed consultations

4.1 The following table consists of the 23 completed consultations conducted by us since the last consultation review.

Consultation	Dates	How we consulted	Responses	
			Organisations	Individuals
Consultation on standards of proficiency for operating department practitioners	30/11/07 – 07/03/08	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	8	3
Consultation on amendments to the standards of proficiency for chiropodists and podiatrists	30/11/07 – 07/03/08	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	5	6
Our fees consultation 2008	14/04/08 – 14/07/08	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	16	33
Consultation on an amendment to the standards of proficiency for radiographers	28/04/08 – 01/08/08	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	6	11
Hearing Aid Council and HPC consultation on standards of proficiency and the threshold level of qualification for entry to the hearing aid audiologists / dispensers part of the Register <sup>3</sup>	15/07/08 – 15/10/08	<ul style="list-style-type: none"> <li>• Not available</li> </ul>	10	4
The statutory regulation of psychotherapists and counsellors: call for ideas	23/07/08 – 24/10/08	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	57	53
Consultation on standards of education and training and standards of education and training guidance	01/08/08 – 14/11/08	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> <li>• Stakeholder events</li> </ul>	54	27 <sup>4</sup>

<sup>3</sup> This was a joint consultation held between the Hearing Aid Council (HAC) and the Health Professions Council.

<sup>4</sup> In addition, we also collected feedback on the standards at events run by the Education department.

<b>Consultation</b>	<b>Dates</b>	<b>How we consulted</b>	<b>Organisations</b>	<b>Individuals</b>
Consultation on an amendment to the HPC (Registration and Fees) Rules Order of Council 2003 - Hearing aid audiologists / dispensers <sup>5</sup>	08/08/08 – 10/11/08	Not available	N/A	N/A
Consultation on Guidance on health and character	30/01/09 – 30/04/09	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• All education providers</li> <li>• Website</li> </ul>	39	6
Consultation on Guidance on conduct and ethics for students	30/01/09 – 30/04/09	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• All education providers</li> <li>• Website</li> </ul>	41	13
Consultation on an amendment to the Standards for Continuing Professional Development	11/02/09 – 11/05/09	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	40	11
Consultation on the HPC (Practice Committees (Constitution) and Miscellaneous Amendments) Rules 2009	20/02/09 – 13/04/09	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	6	0
Consultation on criteria for applications for admission to the Practitioner Psychologists part of the Register made under the Transitional ('Grandparenting') Arrangements	02/04/09 – 08/05/09	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	5	6
Consultation on an amendment to the HPC (Registration and Fees) Rules Order of Council 2003 - Practitioner Psychologists	02/04/09 – 08/05/09	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	3	3
Consultation on the statutory regulation of psychotherapists and counsellors	14/07/09 – 16/10/09	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	137	968

<sup>5</sup> The transfer of the regulation of hearing aid dispensers from the HAC was delayed, necessitating a change to and an additional consultation on the registration cycle for the profession.



<b>Consultation</b>	<b>Dates</b>	<b>How we consulted</b>	<b>Organisations</b>	<b>Individuals</b>
Consultation on the statutory regulation of dance movement therapists	14/07/09 – 16/10/09	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	15	6
Consultation on an amendment to the HPC (Registration and Fees) Rules Order of Council 2003 - hearing aid dispensers	16/07/09 – 16/10/09	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	3	0
Consultation on removing the health reference as a requirement for entry to the Register	04/01/10 – 09/04/10	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	48	29
Consultation on an amendment to the standards of proficiency for health psychologists	12/04/10 – 12/07/10	<ul style="list-style-type: none"> <li>• Appropriate stakeholder mail out</li> <li>• Website</li> </ul>	5	5
Consultation on the HPC Welsh language scheme	01/06/10 – 01/09/10	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Adverts in Welsh press</li> <li>• Website</li> </ul>	10	2
Consultation on proposed changes to the generic standards of proficiency	28/07/10 - 20/10/10	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	54	13
Consultation on our proposals for post-registration qualifications	01/11/10 - 01/02/11	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> </ul>	74	22
Consultation on updating the Guidance on health and character	11/04/11 - 01/07/11	<ul style="list-style-type: none"> <li>• Consultation list mail out</li> <li>• Website</li> <li>• Email to stakeholders</li> </ul>	39	4

## Response rates

- 4.2 As can be seen from the information provided above, the numbers of responses we receive to consultations varies significantly. Often, the number of responses varies depending upon how many people we sent the consultation to. We sent the consultation on the statutory regulation of psychotherapists and counsellors to over 700 individuals and organisations. In addition, a number of professional bodies shared the consultation with their membership. As a result, we received the highest number of responses in the period under review for that consultation.
- 4.3 In total, we received 1,900 responses to the consultations run in this period. This equates to an average of 83 responses to each consultation. If the consultation on the statutory regulation of psychotherapists and counsellors is not included within these figures, we received 795 responses with an average of 35 responses per consultation.
- 4.4 It is difficult to draw conclusions based solely on the strength of response to the consultation. Are the numbers of respondents who agree or disagree with the proposals in a consultation disproportionate on one side or the other? If people agree with our proposals, do they respond to say so, or are they likely not to respond?
- 4.5 Often, individuals in particular will respond to consultations that directly affect them (such as changes to the fees or to standards for their profession). For example, 33 individuals replied to the consultation on changes to our fees. Several professional bodies encouraged their members to reply to the consultation on the statutory regulation of psychotherapists and counsellors.
- 4.6 In the past, we have sent copies of the consultation documents to all our registrants (for example, the consultation documents about changes to our fees and our new CPD processes). In the future, we will only send consultation documents to all our registrants in exceptional circumstances. We advertise all consultations on our website and in our newsletter and any stakeholder, including our registrants, can reply to our consultations.
- 4.7 Many of the consultations outlined above have specific audiences. This includes consultations on setting standards for specific professions or broader consultations related to the regulation of particular professions. The response rate is generally lower for profession specific consultations, rather than consultations that are more general.

## 5. Other regulators' consultation processes

5.1 This section looks briefly at how other regulators carry out their consultations, drawing on recent consultations by particular regulators where appropriate. It is not intended to be exhaustive, but to highlight points of interest that we may want to draw upon as we review our own processes.

### Publicising consultations

- A number of regulators have a consultation page on their homepage, which links to the relevant page on the website.
- Other regulators have a more general 'Get Involved' section, again highlighted on the home page, which includes information about consultations.

### The role of consultation

- Most regulators have information on their website about consultations and why they consult.
- The General Optical Council (GOC) has developed a consultation framework setting out their approach to consultations.<sup>6</sup> The framework covers a number of areas including why the GOC consults, how they consult and how they consider the feedback from the consultation.
- The General Dental Council recently consulted on their revalidation proposals.<sup>7</sup> The consultation document contained a clear statement about how the purpose of the consultation and how the GDC would use responses. For example, the statement sets out clearly that the consultation process is not in itself a 'vote' so decisions the GDC will not make decisions solely based on the strength of the response.

### Accessibility

- The Nursing and Midwifery Council are currently consulting on their proposals around student indexing and provide a glossary of commonly used terms within the consultation document.
- GOC have a consultation checklist that staff must complete before taking a consultation document to Council. The checklist asks a number of questions including whether any particular groups will be affected by the policy proposals and how staff will ensure a four-country involvement.
- Most regulators make a commitment to writing accessible, plain English consultation documents with documents available in different formats on request.

### Collating consultation feedback

- Several regulators, including the General Medical Council and General Pharmaceutical Council (GPhC) use on-line surveys or websites to collate consultation feedback.

---

<sup>6</sup> [http://www.optical.org/en/news\\_publications/consultations/how-we-consult.cfm](http://www.optical.org/en/news_publications/consultations/how-we-consult.cfm)

<sup>7</sup> [www.gdc-uk.org/GDCcalendar/Consultations/pages/Revalidation-consultation.aspx](http://www.gdc-uk.org/GDCcalendar/Consultations/pages/Revalidation-consultation.aspx)

- Other regulators, such as the General Osteopathic Council, have created consultation response forms for respondents to complete.
- Most regulators collect some data about the respondent as well as their responses to the consultation. The data collected could include information about the respondent's practice, their gender or ethnicity, or where the respondent saw the consultation advertised.

## **6. Recommendations**

- 6.1 This section draws together information from the previous sections to highlight points of interest and recommendations we can take forward to improve our consultation processes further.

### **Publicising consultations**

- 6.2 Consultation allows us to seek stakeholders' views on our proposals. Consultation is most effective when we can reach as many relevant stakeholders as possible. It is therefore important that we do all that we can to highlight consultations.
- 6.3 We have four pages dedicated to consultations on our website. The first page lists current consultations, the second page lists previous consultations, the third page lists external consultations that we have responded to and the final page gives some information about our consultation process.
- 6.4 We list all consultations on our website. We work with the Communications department to draft a press release and news release that we issue on the day the consultation starts. The Communications department circulate both releases to a large range of stakeholders including professional bodies and other regulators. On occasion, we will also work with other organisations to highlight the consultation.
- 6.5 Currently, the news and press release appear on the website on the day of the launch. However, there is no continuous link to consultations available from the webpage. Once the news and press releases disappear from the website therefore, there is no easily accessible information advertising a particular consultation.
- 6.6 As outlined above and in Section one of this document, consultation is a key part of our work. We publish the consultation responses document alongside the consultation document once the Council have agreed the responses document. The responses document sets out the changes we are making because of the consultation. However, we do not highlight examples of where we have made changes following consultation feedback, unless it is included within the responses document. Nor do we currently provide a clear rationale for why we consult. Providing both of these would emphasise the importance of consultation and enable stakeholders to see the value of their feedback.

### **Recommendations**

- Webpages about consultations should have links to the relevant press release included within the text.
- Policy and Standards should work with the Communications department to explore additional opportunities to highlight consultations (perhaps alongside other methods of engagement) on the homepage of the website.

- The ‘consultations’ section of the website should be revised to explain in more detail how we use the feedback provided in the consultations and give examples, where appropriate, of changes we have made as a result of the consultation process.

## Consulting widely

- 6.7 We currently publicise our consultations in a number of places, including the website, a hard copy mail out and information in our newsletter. However, we do not currently ask respondents to tell us how they found out about the consultation. Without this information, we are unable to monitor how effectively we publicise the consultation or identify which publication methods are particularly successful.
- 6.8 One of the recommendations from the previous review was that we should consider how to consult with individuals who are not members of a professional body, association or union. The difficulties associated with reaching these individuals are not limited to the consultation process. For example, we did all that we could to publicise the end of the grandparenting period for the first 12 professions we regulated. However, we found it difficult to reach individuals who were independent or domiciliary practitioners and were not a member of a professional body, association or union.<sup>8</sup>
- 6.9 We do not currently collect any data about the sector in which respondents practice or whether or not they are a member of a professional body (or similar). It is therefore difficult to identify whether we experience difficulties reaching registrants who are not members of a representative organisation. Collecting information about whether the respondents work in the public or private sector would help us to identify whether there were any groups of registrants that we were not reaching.
- 6.10 We have commissioned IPSOS Mori to undertake research with a sample of our registrants. Part of the research includes asking whether they have responded to a HPC consultation and if so, where they heard about the consultation. The outcomes of the research would be a valuable tool to help us to identify the effectiveness of our consultation processes and whether we are failing to reach any particular groups of registrants.
- 6.11 However, it is important that we engage not only with our registrants but also with stakeholders more broadly, particularly service users. Any policy decision we undertake must reflect our role in protecting the public and it is important that the standards we set reflect public expectations. We do not currently ask respondents to indicate whether they are a registrant or a member of the public when they are making an individual response to a consultation. Capturing this information would help us to identify how successfully we are reaching individual service users.
- 6.12 This review focuses on our consultation methodology and analysis. However, we can think of the consultation process more broadly as one part

---

<sup>8</sup> Health Professions Council, Review of the grandparenting process, page 25

of how we involve service users in our decision-making. We have a number of service user organisations on our consultation list, which respond to our consultations reasonably infrequently. Engaging more effectively with these groups would allow us to reach a large number of service users and would help to raise the profile of the HPC. It may be helpful to draw on the experience of other regulators, as well as the research we are commissioning on service user involvement, to develop a process of improved service user engagement during the consultation.

- 6.13 We have recently commissioned research into service user feedback tools as part of our research into the evidence base for revalidation. We have focussed the research on how feedback can improve professional practice. However, the outcomes of the research may be helpful in thinking about our engagement with service users.

### **Recommendations**

- Change the consultation form so we can record how respondents heard about the consultation and the profession they practice within (where appropriate).
- Explore how other regulators approach reaching a wide range of stakeholders, including registrants, service users and organisations.
- Review the outcomes of the research into service user involvement to identify if there are any points that we could draw upon to improve our processes.

### **Collating consultation responses**

- 6.14 We currently collate consultation responses manually. This can be extremely labour-intensive and means that in busy periods, additional resources may be required to process all consultation responses.
- 6.15 We ask respondents to submit their consultation response in writing. It has sometimes been difficult in the past to identify which question respondents are answering. In addition, we did not ask respondents whether they agreed with a particular question, making it difficult to undertake a quantitative review of their feedback.
- 6.16 We have recently introduced a consultation responses form to help us to manage some of these difficulties. The consultation form has sections for each question, asking respondents whether they agree with a particular question and providing space for their comments. We invite respondents to use the response form if they want to, but do not have to use the form. The form has improved how we gather feedback as it is easier to allocate responses to particular questions and to undertake a quantitative review.
- 6.17 Although it is difficult to predict the number of consultation responses we receive, the response rate is likely to increase as we take on the regulation of social workers in England and potentially other groups in the future. Collating the responses is very labour-intensive when there is significant interest in the consultation. A number of regulators use on-line response systems, which automatically collate the consultation responses and provide

reports on the feedback. These on-line systems significantly reduce the resource impact of running consultations, particularly when several consultations are running at once.

6.18 Developing the on-line consultation system would be a significant undertaking and it is beyond the scope of this document to explore its development in detail. However, if the recommendation to develop the system was taken forward the following points would need to be considered:

- The system must allow for both qualitative and quantitative analysis of the responses.
- Respondents will still be able to use other methods (such as email) to reply to the consultation. Care must be taken to ensure that there is no unnecessary duplication either in recording of specific responses or more generally in the administration of response collation.
- Each consultation we run is slightly different. The system will therefore need to be sufficiently flexible to accommodate differences in consultation questions, length and response times.
- The system must be as accessible as possible and not tied to a particular internet browser or computer programme.

### **Recommendations**

- Continue to use a consultation response form (with on-going revision as appropriate).
- Explore the development of an on-line system to collect consultation responses (potentially using a tool such as survey monkey<sup>9</sup>).

### **Continuous improvement**

6.19 We have now undertaken two consultation reviews. However, it is important that, in addition to regular detailed review, we also undertake to improve our consultation processes continuously.

6.20 We share responsibility for running consultations across the department. Currently, there is no mechanism for sharing learning points identified from particular consultations. In addition, we do not record centrally the number of stakeholders we sent the consultation to, nor the number of responses received.

6.21 As outlined above, we have recently introduced a consultation response form. As the form is new, the final question on the form asks respondents for feedback on the forms themselves, to see if the forms are useful. In response to feedback from the first respondents to use the form, we now indicate on the form the sections of the consultation document relevant to the question. We should continue to ask respondents for their feedback on the consultation response form whilst we use the form. This feedback will also help us to develop an on-line consultation system.

---

<sup>9</sup> <http://www.surveymonkey.com/>



6.22 Consultation documents should be consistent with the style guidance for HPC documents and our desire to make documents as accessible as possible by writing them in Plain English. The department shares responsibility for running consultations as different individuals draft consultation documents and responses documents. We take care to ensure consistency where appropriate, whilst recognising that we need to provide different information for different consultations.

### **Recommendations**

- Create a consultation spreadsheet to update with information about the numbers of documents sent, the response rates and any learning points from the consultation.
- Continue to ask respondents for their feedback on the consultation response form and the consultation process more generally.
- Create a template consultation document and consultation responses document or a style guide for writing these documents.
- Add a glossary section to consultation documents.

## 7. Implementation

We have set out in this section the actions for implementation and created an indicative timetable for implementation.

Action	Timeframe for delivery
Webpages about consultations should have links to the relevant press release included within the text.	On-going
Change the consultation form so we can record how respondents heard about the consultation and identify their profession (where appropriate).	October 2011
The 'consultations' section of the website should be revised to explain in more detail how we use the feedback provided in the consultations and give examples, where appropriate, of changes we have made as a result of the consultation process.	December 2011
Create a consultation spreadsheet to update with information about the numbers of documents sent, the response rates and any learning points from the consultation.	December 2011
Create a template consultation document and consultation responses document or a style guide for writing these documents.	December 2011
Add a glossary section to consultation documents.	On-going
Policy and Standards should work with the Communications department to explore additional opportunities to highlight consultations (perhaps alongside other methods of engagement) on the homepage of the website.	March 2012
Explore the development of an on-line system to collect consultation responses.	December 2011
Explore how other regulators approach reaching a wide range of stakeholders, including registrants, service users and organisations.	December 2011
Review the outcomes of the research into service user involvement to identify if there are any points that we could draw upon to improve our processes.	March 2012