

Council 30 June 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 October 2014 and 31 March 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

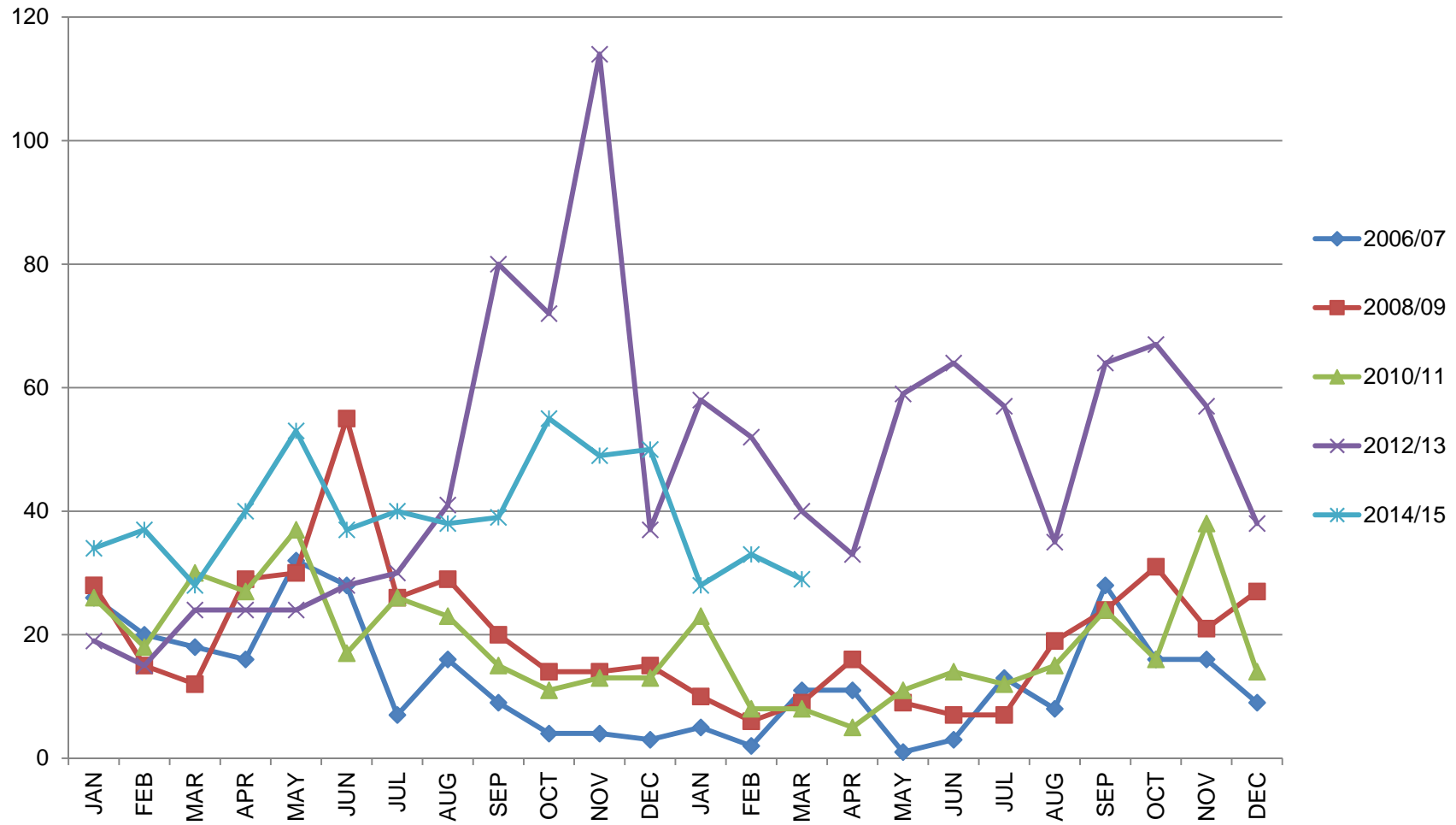
Date of paper

16 June 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 October 2014 to 31 March 2015), 244 complaints and 58 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. For example, during the review period, 1,154 new cases were opened in Fitness to Practise, in comparison with 1,045 for the same period last year. 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. During the last two years, the number of complaints we have logged has fallen steadily.
- 1.6 The following graph shows the monthly distribution of complaints logged from January 2006 to March 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.

Distribution of complaints received across two year cycles



- 1.7 Between October and December 2014, there was a peak in the number of complaints. This corresponded with the renewal cycles of social workers in England and operating department practitioners, who renewed between 1 September and 30 November. A smaller number of complaints are generally received at the beginning of the year (with the period directly after social workers joined the Register being the exception to this). Complaints received in the months of January to March usually fall below the average for that year.



- 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

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. Since then, the number of complaints received has slowly decreased.

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

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 financial year 2014-15, 491 complaints were logged, this is 1.48 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 244 complaints. We responded to 213 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.

3.0 Number of complaints received by department and profession

3.1 During the review period we logged 244 complaints. The table below shows how many complaints each department responded to.

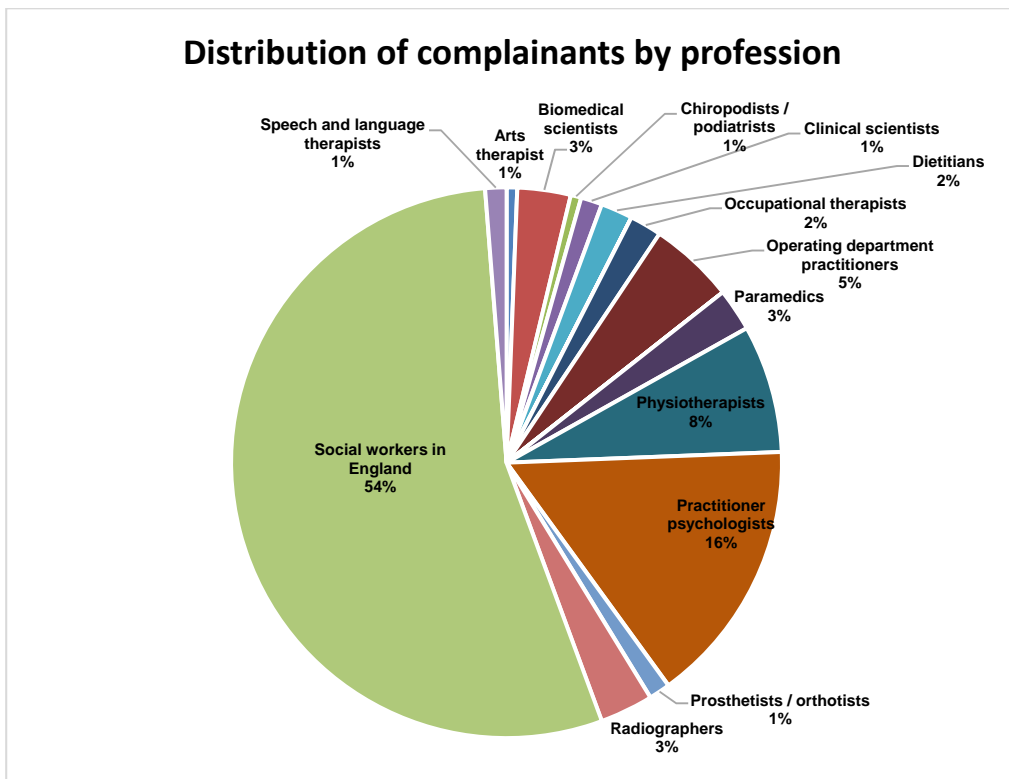
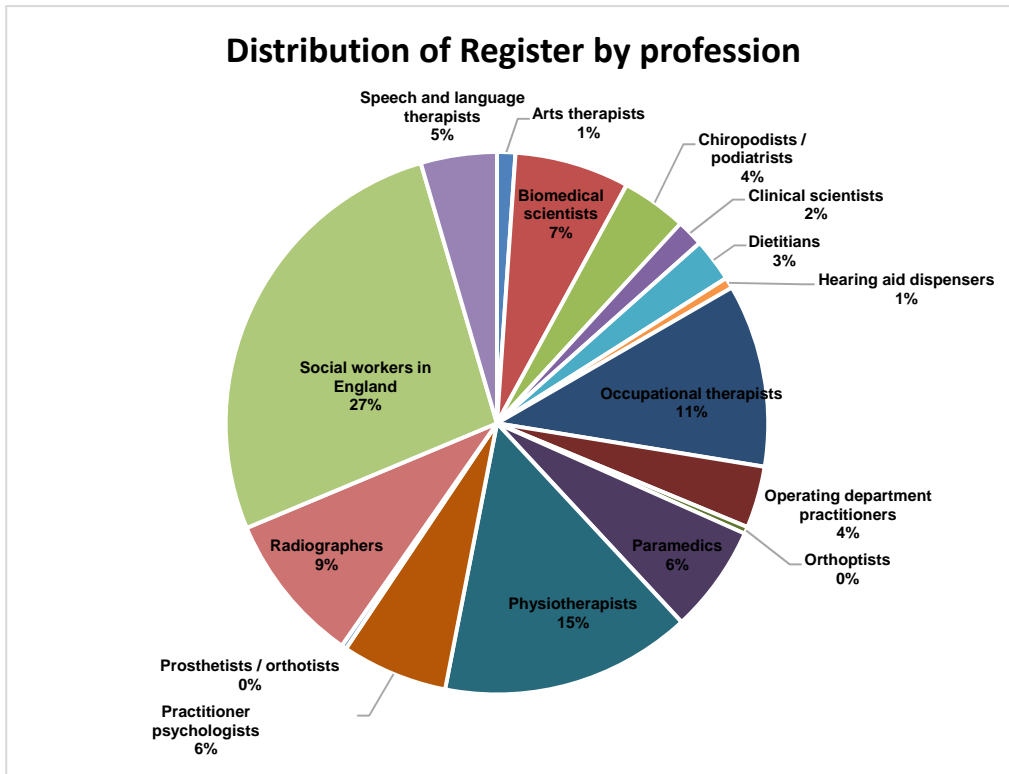
Department	Number of complaints
Communications	3
Finance	2
Fitness to Practise	100
Partners	1
Policy and Standards	2
Registration	134
Secretariat	2
Total	244

3.2 During the review period, we received 160 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	0.3
Biomedical scientists	5	0.2
Chiropodists / podiatrists	1	0.1
Clinical scientists	2	0.4
Dietitians	3	0.4
Hearing aid dispensers	0	0
Occupational therapists	3	0.1
Operating department practitioners*	8	0.7
Orthoptists	0	0
Paramedics	4	0.2
Physiotherapists	12	0.2
Practitioner psychologists*	25	1.2
Prosthetists / orthotists	2	2.0
Radiographers	5	0.2
Social workers in England*	87	1.0
Speech and language therapists	2	0.1

*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.



3.4 The table below shows the distribution of complainant's professions and the distribution of the profession in proportion to the whole Register. During the last reporting period, the percentage of total complaints received from each profession was broadly comparable to the profession's percentage size on the Register. This time, there are two distinct groups who provided more feedback than others, that is social workers and practitioner psychologists. For example, social workers make up 26.8 per cent of the Register and 54.4 per cent of complaints were from social workers. Last reporting period, social workers made up 27.6 per cent of the Register and 26.1 per cent of complaints were from social workers.

	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapists	0.6	1.1	0.6
Biomedical scientists	3.1	6.8	0.5
Chiropodists / podiatrists	0.6	3.9	0.2
Clinical scientists	1.3	1.6	0.8
Dietitians	1.9	2.6	0.7
Hearing aid dispensers	0	0.7	--
Occupational therapists	1.9	10.9	0.2
Operating department practitioners*	5.0	3.7	1.4
Orthoptists	0	0.4	--
Paramedics	2.5	6.4	0.4
Physiotherapists	7.5	15.0	0.5
Practitioner psychologists*	15.6	6.3	2.5
Prosthetists / orthotists	1.3	0.3	4.1
Radiographers	3.1	9.0	0.3
Social workers in England*	54.4	26.8	2.0
Speech and language therapists	1.3	4.5	0.3

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

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.

3.6 No complaints were logged from hearing aid dispensers or orthoptists, two of the three smallest professions on the Register, both represent less than 1 per cent of the Register.

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
October	55	<ul style="list-style-type: none"> UK registration - registration reminder letters (social workers) UK registration - renewal issues FTP - Pre-ICP / Standard of acceptance decisions 	Registration - 35 Fitness to practise - 17 Finance - 2 Communications - 1	96%	HCPC 27% Reg 4% N/A 69%
November	49	<ul style="list-style-type: none"> UK registration - renewal issues, including online renewal portal (social workers) UK registration - payment of a year's registration fee for less than a year's registration (social workers) International registration - English proficiency for applicants exercising EEA mutual recognition rights Pre-ICP / Standard of acceptance decisions 	Registration - 35 Fitness to practise - 12 Communications - 1 Policy - 1	88%	HCPC 20% Reg 8% N/A 72%
December	50	<ul style="list-style-type: none"> UK registration - renewal and readmission (social workers) International registration - English proficiency for applicants exercising EEA mutual recognition rights FTP - Pre-ICP / Standard of acceptance decisions 	Registration - 28 Fitness to practise - 20 Partners - 1 Secretariat - 1	92%	HCPC 38% Reg 6% N/A 56%

January	28	<ul style="list-style-type: none"> • UK registration - renewal issues (social workers) • UK registration - CPD audit issues • FTP - Pre-ICP / Standard of acceptance decisions • FTP - ICP decisions 	Fitness to practise - 16 Registration - 12	82%	HCP 21% Reg 14% N/A 65%
February	33	<ul style="list-style-type: none"> • UK registration - various registration issues (social workers) • International registration - time taken for assessor decisions • FTP - Pre-ICP / Standard of acceptance decisions 	Fitness to practise - 16 Registration - 15 Policy and Standards - 1 Secretariat - 1	64%	HCP 50% Reg 6% N/A 44%
March	29	<ul style="list-style-type: none"> • UK registration - various registration issues • FTP - Pre-ICP / Standard of acceptance decisions 	Fitness to practise - 19 Registration - 9 Communications - 1	93%	HCP 30% Reg 0% N/A 70%

Total number of complaints: **244**

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.

5.2 Registration application process - relatively few complaints were received about the application process this year. Outside of complaints relating to personal circumstances, for example, the application form being returned because it was incomplete or a person wanting to start a job immediately, complaints related to:

- Application tracking - not having a mechanism for tracking where the application form was within the process and not being given a fixed date that the process would be completed by.
- Application process not being online.
- Accessibility and application format for anyone with access issues, for example the current form is a PDF that cannot be edited and completed on a computer, it needs to be printed and completed in writing.

5.3 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.

5.4 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.
- 5.5 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.
- 5.6 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.
- 5.7 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.
- 5.8 Registration fees - some complaints about the fees included residual issues around the transfer of social workers from the General Social Care Council (GSCC), for example, the GSCC charged much less for registration than the HCPC. Other complaints and feedback related to:
- Not reducing fees for registrants who are on maternity leave.
 - Not reducing fees for registrants who work part-time.
 - Unclear when registering that the registration fee is payable for less than a year's registration.
 - Not having the option to pay by monthly direct debit installments.
- 5.9 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.

5.10 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.

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

6.0 Root cause of complaints

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

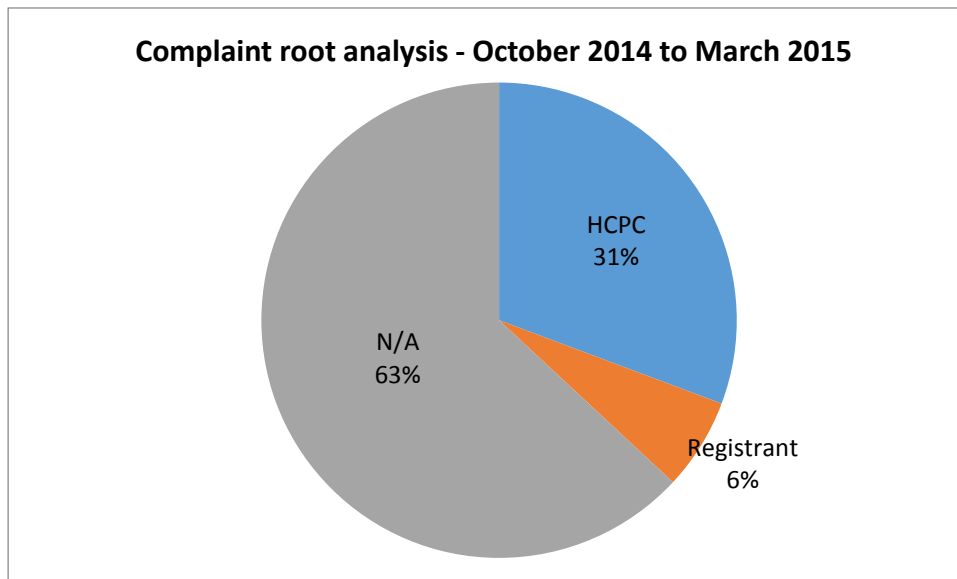
6.2 Three groups are used to classify complaints, they are:

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

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

- HCPC – 74 complaints
- Registrant / applicant – 15 complaints
- N/A – 152 complaints

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



This distribution is almost identical with the last reporting period (April 2014 – September 2014) which was:

- HCPC – 32%
- Applicant / registrant – 5%
- N/A – 63%

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 (63%) 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.

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

- Extra quality checks 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.
- Training and feedback for employees on an individual basis through line managers and departmental trainers.
- 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.

7.8 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:

- The online renewal portal could incorporate online direct debit mandates.
- Applicants have asked to be kept informed by text or email about where their application for registration or readmission form is within the registration process.
- Registrant's records could have a removal flag, to indicate that they will be coming off the Register at the end of the registration cycle to prevent their inclusion in unnecessary renewal reminder mailings.
- Options on our systems for any person that may require different or adapted access to allow them to complete processes online.

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 58 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 thanks from registrants for employees in Fitness to Practise for their help and guidance through the FTP process; for Registration advisors for help with the international application process and stakeholders thanking members of the Communications department for presentations at HCPC and external events. The following are a small number of examples of feedback that we have received from stakeholders:

- Positive feedback from a registrant in FTP proceedings for a Hearings Officer, the registrant thanked her for help through the FTP process.
- Positive feedback from an employee at another regulator for her visit to the HCPC, with presentations from Education, Registration, Policy and Standards and Fitness to Practise, she commented that she had found the day extremely useful and felt very welcome.
- Positive feedback from a registrant for the new HCPC phone app, "I recently downloaded the new app and it is very useful to have the information at my fingertips. It is like having the HCPC in my pocket!"
- Positive feedback from a group of registrants regarding our research report "Preventing small problems" and the Meet the HCPC event at Leamington Spa, a registrant commented that it is "good to see that HCPC understand what is happening at grass roots level".

8.3 The table below shows how many pieces of positive feedback have been logged during the last eight years in each reporting period. A steady increase has been seen over the last few years, which can in part be attributed to a greater awareness of logging positive feedback.

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

9.0 Conclusion

- 9.1 The number of complaints logged during this reporting period was similar to the last six month reporting period. This was a decrease from the same period last year and the previous year.
- 9.2 The distribution of complaints received was less balanced across the professions than in previous reporting cycles. Practitioner psychologists and social workers contributed more complaints than previously, both these professions were in renewal during this time.
- 9.3 The Fitness to Practise and Registration departments continue to receive the most feedback. Both departments carry out the most individual transactions with registrants and other stakeholders.
- 9.4 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 per registrant has decreased in the last two years.
- 9.5 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 and to identify areas for improvement.
- 9.6 The next report will cover the period 1 April to 30 September 2015.