
Annual Review of Feedback and complaints 1 April 2019 - 31 March 2020

Executive Summary

This is report on the feedback received by the HCPC during the year including complaints, general feedback and positive feedback. The report provides information regarding performance against service standards, themes identified from complaints, corrective action undertaken and learning.

Previous consideration	None
Decision	The Audit Committee is being asked to discuss this paper and provide feedback on the content of the report.
Next steps	None
Strategic priority	The strategic priorities set in 2018 are no longer current. We are developing a new strategy that we aim to confirm at the end of 2020.
Risk	Strategic risk 1: failure to deliver effective regulatory functions
Financial and resource implications	None
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Audit Committee, 17 September 2020

Review of feedback and complaints – 1 April 2019 to 31 March 2020

Executive summary

Background

The Health and Care Professions Council (HCPC) has operated a feedback and complaints function since 2004. Complaints, positive feedback, correspondence of note and letters from MPs are logged as part of the process.

A report of this feedback, including a summary of every upheld and partially upheld complaint and response is compiled on a monthly basis and presented to SMT.

More detailed monthly reports are sent to the relevant department heads. This always includes the Heads of Fitness to Practise and Registration Departments, who receive the bulk of complaints due to the high number of ‘customer’ interactions they undertake.

The attached paper provides a summary of the feedback received between 1 April 2018 and 31 March 2019. It breaks down the complaints received across the departments, detailing the performance against service standards, and identifying themes in Registration and Fitness to Practise complaints.

Decision

This paper is to note. No decision is required.

Background information

HCPC’s customer service policy is available at:
www.hcpc-uk.org/aboutus/customerservice

Resource implications

None

Financial implications

None

Date of paper

9 September 2020

1.0 Introduction

- 1.1 This report is a summary of feedback that the Health and Care Professions Council (HCPC) received between 1 April 2019 and 31 March 2020.
- 1.2 The Service and Complaints Manager manages the customer feedback received across the organisation in accordance with our Customer Service Policy and Customer Service Process.
- 1.3 Feedback received by the HCPC includes complaints received and positive feedback. Requests for information and general comments about processes and procedures are also logged and reported on.
- 1.4 The PSA changed the standards by which they judge the performance of regulators in 2019-20 and introduced a new standard focussing on regulators addressing concerns identified about it, including through feedback received from stakeholders.
- 1.5 During this reporting period we logged 568 complaints and 43 pieces of positive feedback. The majority of complaints received were about policies, processes and service related to the Fitness to Practise (FTP) and Registration Departments. 88% of complaints received in this period were responded to by these two departments. This is consistent with historic trends.
- 1.6 The report provides a review of the complaints received during the period, and provides data for the departments that have responded to complaints, the main themes in complaints and changes made as a result of feedback. Some examples of positive feedback are also included.

2.0 Complaints received 1 April 2019 - 31 March 2020

- 2.1 568 complaints were received during the reporting period, an average of 47 per month. This compares with 451 complaints at an average of 38 per month during 2018-19.
- 2.2 The vast majority of complaints received were about functions and activities carried by the Registration and FTP Departments, which received 57% and 31% of the complaints respectively. This compares to 50% and 41% of the complaints respectively in the previous period. The table below shows the number of complaints received each month by department.

	Reg	FTP	HCPTS	Finance	Policy	Org Wide	Other Depts	Total
Apr	21	20	4		3			48
May	32	16	1	12		1		62
Jun	13	13	5	1			3	35
Jul	22	13	1	1	1			38
Aug	23	12	3	1				39
Sep	26	13	3					42
Oct	42	23	5	2				72
Nov	45	25	3	6				79
Dec	29	7						36
Jan	25	12	5	1				43
Feb	29	11	3	1				44
Mar	18	9	2		1			30
Total	325	174	35	25	5	1	2	568

2.3 Complaints increased during the period due to a number of professions being in renewal during the busier summer months in registration. Complaints for the registration department tend to increase during the summer due to large numbers of new graduate applications received and when professions are in renewal there are also increased numbers of complaints due to issues associated with renewal. There was also a focus in FTP on preparing for the transfer cases to Social Work England, which resulted in some complaints.

2.4 Complaints about the renewal process or knock-on effects were a prominent theme during this review period in line with previous years. During the review period, we received 76 complaints about the registration department related to renewal, which is approximately a quarter of their complaints.

3.0 Performance against Service Standards

3.1 Our agreed service standard is 15 working days to provide a substantive response to complaints. We closed 441 complaints within our service level, which represents 78% of complaints to which we replied. This is a slight reduction from 81% replied to within service level during the previous period. The table below shows the performance against service standards by department on a monthly basis.

	Reg	FTP	HCPTS	Finance	Policy	Org Wide	Other Depts
Apr	81%	43%	100%		67%		
May	78%	81%	100%	100%		100%	
Jun	100%	54%	100%	100%			100%
Jul	91%	45%	100%	100%	0*		
Aug	87%	83%	100%	100%			
Sep	73%	85%	100%				
Oct	71%	83%	100%	100%			
Nov	93%	54%	67%	100%			
Dec	86%	43%					
Jan	80%	92%	100%	100%			
Feb	83%	82%	100%	100%			
Mar	28%	89%	100%		0*		

*Only 1 complaint was received but was replied to outside the service standard.

- 3.2 We closed 3 complaints without sending a reply. This was because the complainants withdrew their complaint.
- 3.4 We introduced new internal complaint handling response times in June 2020 to prioritise the complaints received and improve the performance against service standard. We have already seen positive results in the performance against service standard with 100% compliance to date.

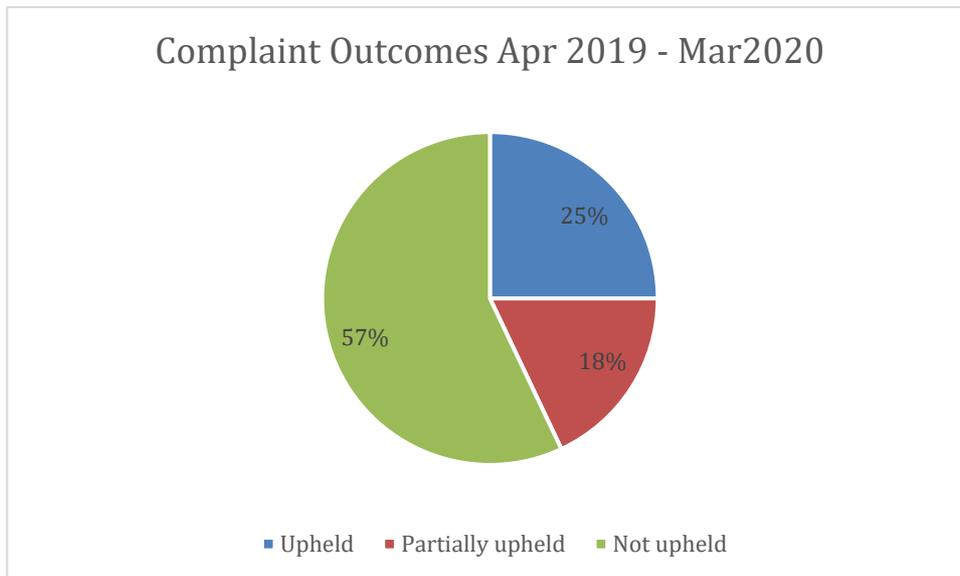
4.0 Professional Standards Authority

- 4.1 As outlined in 1.4, the PSA introduced a new standard which assesses how regulators address concerns identified through feedback, including complaints.
- 4.2 Although the PSA has not previously had a standard relating to this, the HCPC had always seen learning as an integral part of feedback received and had reported on this internally.
- 4.3 In assessing this standard, the PSA asked the HCPC to provide a lot of statistical information about the timeliness in dealing with complaints as well as evidence of learning.
- 4.4 The HCPC is awaiting notification as to whether we achieved the standard in the 2020 performance review.
- 4.5 The Service and Complaints Manager contributes to the PSA working group and is part of a Healthcare Regulators Complaint Forum.

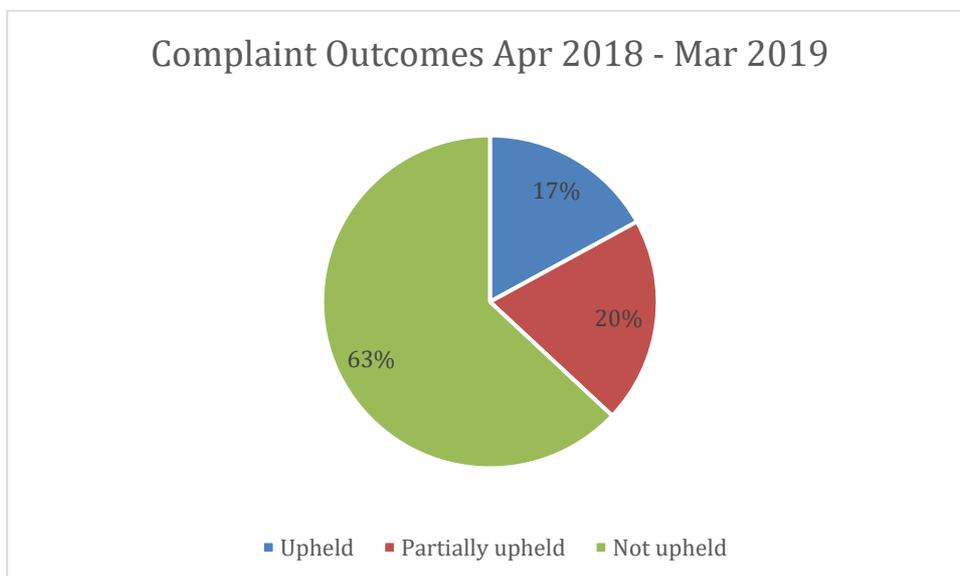
5.0 Complaint outcomes

- 5.1 Since October 2016 the HCPC has recorded whether complaints are upheld, not upheld, or partially upheld. This is a subjective assessment based on the validity of the main aspects of the complaint and any subsidiary issues. The Service and Complaints Manager makes this assessment to ensure consistency and neutrality. The majority of complaints (57%) were not upheld during the review period.
- 5.2 The majority of complaints received during the period were not due to an HCPC error following an analysis of the complaint. In these cases, the complainant is provided with details of any relevant actions, policies and procedures so they can understand why actions have been or have not been taken.

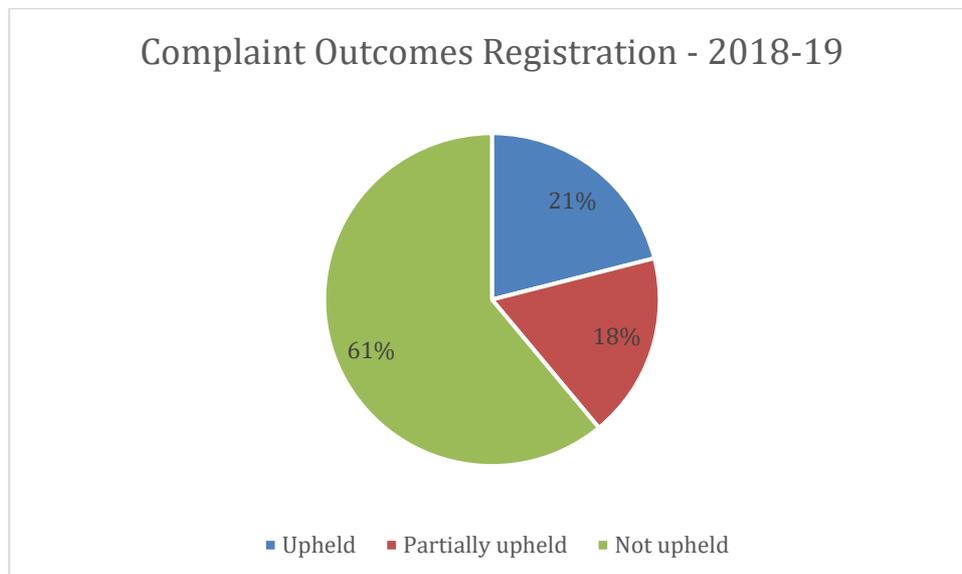
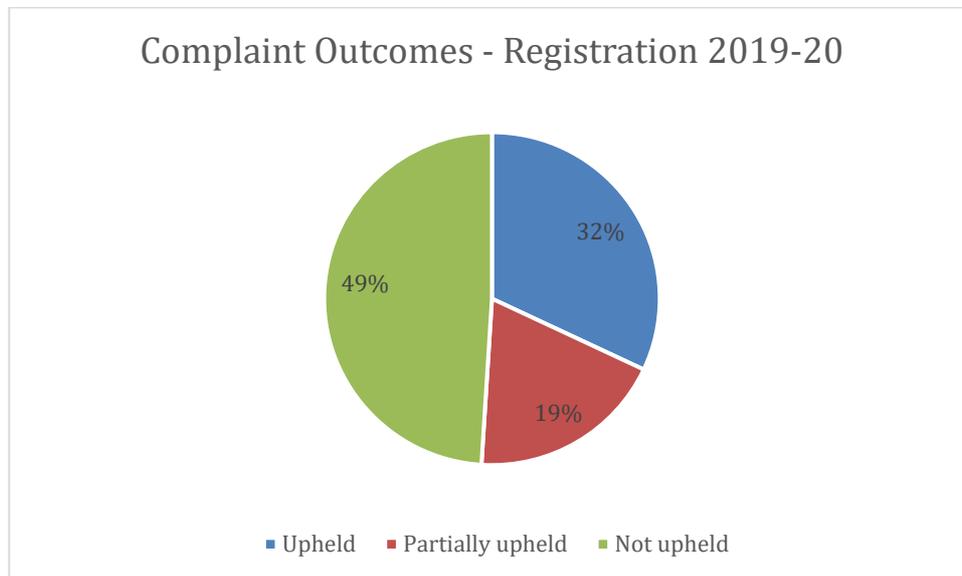
5.3 The Graph below shows the distribution of outcomes across the organisation in the three categories during the period.



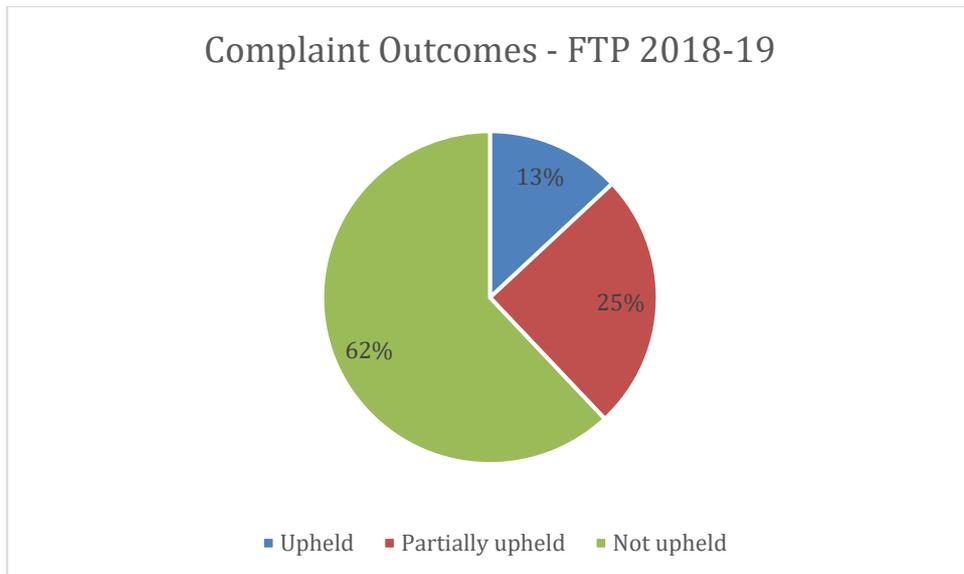
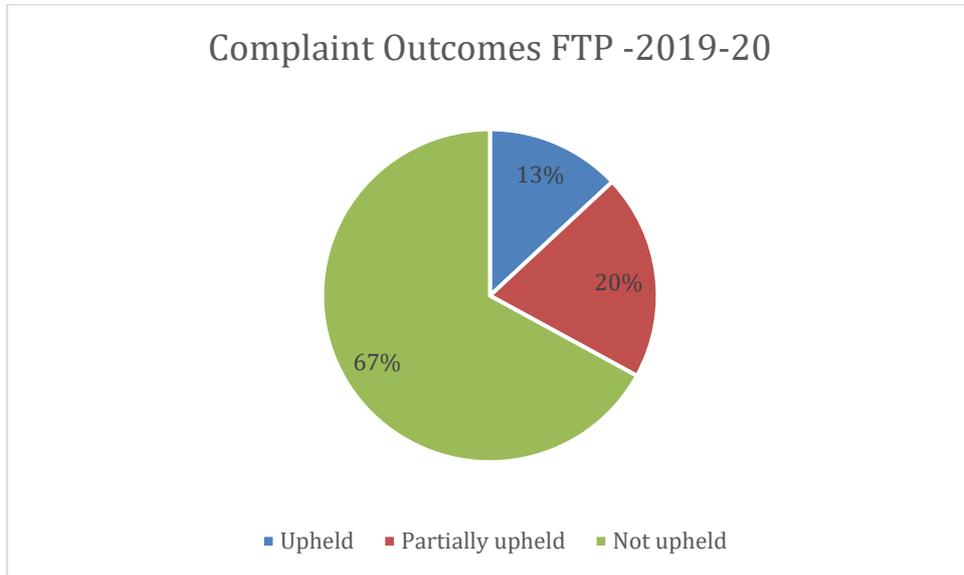
5.4 The table below shows the distribution of outcomes in the three categories during the previous period.



5.5 The graphs below shows the distribution of outcomes for Registration during the period of this report and the previous period.



5.6 The graphs below shows the distribution of outcomes for FTP complaints during the period of this report and the previous period.



6.0 Main complaint areas

6.1 This section provides further details about the main areas of negative feedback received during the review period.

6.1.0 Fitness to Practise

6.1.1 The majority of complaints about FTP processes were received from members of the public who were usually complainants in FTP cases, followed by registrants as the second most common source. Complaints were also received from registrant representatives, employers, and other parties in FTP cases.

- **Pre-Investigating Committee Panel (ICP) and standard of acceptance/threshold decisions.** Complaints related to cases where the FTP Department had deemed a concern or concerns raised by the complainant against a registrant did reach the threshold (formerly the standard of acceptance) for referral to an ICP.
- **Communication.** Complaints received from parties in a case about a lack of updates of progress from case managers and of not being informed of a change in case managers.
- **Delay.** Complaints received from both complainants and registrants in FTP cases regarding the length of time taken to make a decision as to whether the concerns raised should be referred to an ICP.
- **Investigating Committee Panel (ICP) decisions.** Complaints relating to the ICP's decision to close a case without referring it to a final hearing.

6.2 HCPTS

- **Management of Hearings.** Complaints from registrants, complainants and witnesses about scheduling of hearings, adjournments and conflicts of panel members.
- **Conduct of hearings.** Complaints from parties about the tone and type of questioning and alleged bias of panel members.
- **Decisions.** Complaints about the recording and accuracy of decisions made.
- **Website.** Complaints about decisions being published on the website which are also recoverable through search engines

6.3 Registration

6.3.1 The vast majority of complaints about the Registration Department come from applicants and registrants.

- **Registration renewal.** Registrants' main concerns were around difficulties accessing the online renewal portal to complete online renewal and delays in getting replacement authentication codes or that their codes did not work. Registrants also complained that they did not receive letter and/or email reminders of renewal. Registrants complained that renewal reminder letters were sent to their employer and about the tone of those letters.
- **Readmission process following renewal.** Registrants' main concerns were that they did not feel that they were responsible for failure to renew so should not have to complete a readmission form. There were also concerns about the time and cost involved in completing the readmission process.
- **Removal for direct debit issues.** Registrants' main complaints were they did not get notifications of the direct debit issues and the need to make payment or the direct debit failure was not their fault.
- **UK applicants.** Applicants' main concerns were delays in registration due to passlist issues or a referral to FTP.
- **Continuing Professional Development (CPD) audit.** Physiotherapist registrants complained of receiving emails and texts with CPD reminders, when they had not previously been informed they had been selected for audit.
- **International application process and processing times.** Applicants' main concerns related to the time that their application took to be processed, a lack of updates and delays with the initial and final outcomes of their application.
- **International applications – documents.** Registrants complained of the certification requirements and that documents they submitted had been lost.
- **Communication.** Difficulties in getting through to the Department by telephone during busy renewal periods.
- **Lost documentation.** Lost postal orders and cheques sent with applications, lost applications and marriage certificates.
- **Certificates.** Registrants expressed dissatisfaction that they no longer received a certificate of registration.

6.4 Other departments

- **Direct debit mandates.** A number of complaints were received about the short timeframe allowed to submit an amended direct debit mandate following a mailing to occupational therapists.
- **Fee rise.** A number of complaints were received about the proposed registration fee rise and many related this to HCPC Christmas party costs seemingly linked to social media activity relating to an historic FOI request.

7.0 Corrective action

7.1 Where complaints are upheld, apologies are given and as far as is possible remedial action is taken. Where the complaint identifies a systemic issue, corrective action is taken.

7.2 During this review period, a number of corrective actions have resulted from complaints or feedback. The following are examples:

- We withdrew the reminder letter sent to employers advising of potential registrant removal from the Register for failure to renew.
- Guidance was given to registration advisors regarding annotations for chiropodists who qualified with historic qualifications.
- Additional manual system checks were put in place when sending of CPD selection notifications.
- The wording was changed on bulk mailings sent to groups of registrants notifying them that they had to submit new direct debits due to changes in banking rules.
- A check was introduced when fixing ICP dates in FTP to ensure panel members were of the correct professional modality where that was required.
- Messages were put on the HCPC website regarding service disruption and high call volumes in the Registration department.

7.3 Where feedback identifies serious systemic errors these are included in the near miss reports and improvement log.

8.0 Organisational learning

- 8.1 Monthly complaint reports are disseminated to the Heads of the departments that receive complaints during the month, which contains a summary of every complaint received during that month and any themes of complaints received.
- 8.2 The Service and Complaints Manager meets separately with the Heads of Fitness to Practise Department and Registration on a quarterly basis to consider any learning from complaints and changes that may be required as a result.
- 8.3 Most learning from complaints is departmental specific. One theme identified which is cross-organisational is the tone and content of correspondence. This was also identified in research into registrant experiences of the fitness to practise process and is being addressed through a tone of voice review by the Policy department as part of a health and wellbeing strategy.

9.0 Positive feedback

- 9.1 The HCPC logs positive feedback alongside complaints to help ensure that good practice is noted alongside areas that could be improved. During the review period, we logged 43 pieces of positive feedback compared to 48 in the previous period. These included letters and emails thanking employees for many different activities but were most commonly from panel members and other attendees at hearings for hearings officers.
- 9.2 The following are a small number of examples of positive comments that we have received from stakeholders.
- Feedback from the College of Paramedics “The progress being made with registration has been amazing and so very helpful to our frontline staff. All the May starters are registered which is a massive relief.”
 - Feedback from a witness at a hearing. “The hearings officer was very helpful and personable and clear in his instruction re the process and protocol both before and on the day of the hearing.”
 - Feedback from an attendee at a hearing. They said that they commended Hearings Officer and the team “on the manner in which the hearing was conducted. The hearing was conducted professionally with the right amount of empathy and support. By the end of first day they were sure that the panel and your team would support my colleague through the process, regardless of the outcome.” They wanted to pass on their gratitude to the whole team and especially the receptionists who were super.

- Feedback from a registrant seeking renewal for a registration advisor. The advisor “was really helpful and polite. Despite it being what I imagine is a busy time of the year for you, my call was answered quickly and the call taker was patient and very professional so credit where credit is due.”
- Feedback from a potential registrant regarding staff in the Registration Department who “have been friendly, helpful and informative throughout this process. It is rarely such great service is provided and I believe how professional and helpful all members in the HCPC have been is noteworthy”
- Feedback from an education provider for the Education team. “Thank you for helping us achieve this approval with a more streamlined approach across the 3 universities. Much appreciated and do thank the officers too.”
- Feedback from a registrant for a Case Manager. “Thank you for this and for your hard work during the case. I very much appreciate your support”
- Feedback from a registrant for a receptionist “for being so helpful, professional and positive. (Their) customer service ought to be one of the best I have ever received. Please pass on my sincerest thanks.”

9.4 Positive feedback is disseminated to employees and their managers when received. We are looking at ways to share positive feedback received across the organisation more widely and enhance awareness that positive feedback is valued and logged.

10.0 Conclusion

10.1 We logged 568 complaints during the period 1 April 2019 to 31 March 2020. This is a significant increase on the 451 logged during the previous period.

10.2 The FTP and Registration Departments continue to receive the most feedback with 57% and 31% of the complaints received respectively, which is to be expected as these Departments have the most individual interactions with registrants and other stakeholders.

10.3 78% of complaint responses were sent within the expected response time of 15 working days. New internal processes have now been implemented to improve response times.

10.4 We logged 43 pieces of positive feedback for individuals and teams across the organisation in this reporting period.