

Review of feedback and complaints – 1 April 2020 to 31 March 2021

Executive Summary

The attached paper provides an annual summary of the feedback received between 1 April 2020 and 31 March 2021. 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.

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.

Previous consideration	17 September 2020
Decision	This paper is to note. No decision is required.
Next steps	None
Strategic priority	Strategy Aim 1 – Continuously improve and innovate
Risk	Strategic risk 1: failure to deliver effective regulatory functions
Financial and resource implications	None
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1.0 Introduction

- 1.1 This report is a summary of feedback that the Health and Care Professions Council (HCPC) received between 1 April 2020 and 31 March 2021.
- 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. Therefore, we record where we undertake changes as a result of feedback and provide evidence requested by the PSA when carrying out their annual review.
- 1.5 During this reporting period we logged 448 complaints and 52 pieces of positive feedback. The majority of complaints received were about policies, processes and service related to the Registration and Fitness to Practise (FTP) departments. 93% of complaints received in this period were responded to by these two departments and reflects the fact that these departments have the most interactions with registrants and other stakeholders.
- 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 2020 - 31 March 2021

- 2.1 448 complaints were received during the reporting period, an average of 37 per month. This compares with 568 complaints at an average of 47 per month during 2019-20.
- 2.2 The vast majority of complaints received were about functions and activities carried by the Registration and FTP departments, which received 64% and 29% of the complaints respectively. This compares to 57% and 31% of the complaints respectively in the previous period.

2.3 The table below shows the number of complaints received each month by department.

	Reg	FTP	HCPTS	Finance	Policy	Org Wide	Other Depts	Total
Apr	10	14	1		1			26
May	10	13						23
Jun	17	8	3				1	29
Jul	20	9	3				3	35
Aug	12	12		1				25
Sep	27	17						44
Oct	23	10	1					34
Nov	27	8	2			1		38
Dec	23	9		1			1	34
Jan	35	10	2	8	1			56
Feb	26	11					1	38
Mar	56	9					1	66
Total	286	130	12	10	2	1	7	448

2.4 Complaints decreased during the period as less complaints were received during the early months of the global pandemic and throughout the summer months only returning to normal levels from September 2020 onwards. Complaints received started to increase significantly from January 2021. This seems to be due to a combination of stakeholders no longer accepting that there should be a significant impact on service due to the pandemic and there also being some service issues in the Registration department.

3.0 Performance against Service Standards

- 3.1 Our service level is 15 working days to provide a substantive response to complaints from the date of receipt. In June 2020 we introduced a new internal complaint handling process to both assess the complaints received according to priority and improve our performance against service standard.
- 3.2 We closed 437 complaints within our service level, which represents 98% of complaints to which we replied. This is a significant improvement from 78% replied to within service level during the previous period and reflects the success of the new internal complaints process in achieving compliance with the service standard.
- 3.3 Only seven complaints missed the 15 working day service standard for response and only one of these was after the new complaints handling process was introduced. This compares to 123 complaints which were replied to outside of service standard in the previous period.
- 3.4 The mean response time during the period was 7 working days and the median response time 8 working days. This is a significant improvement on the previous period of 11 and 13 working days respectively.

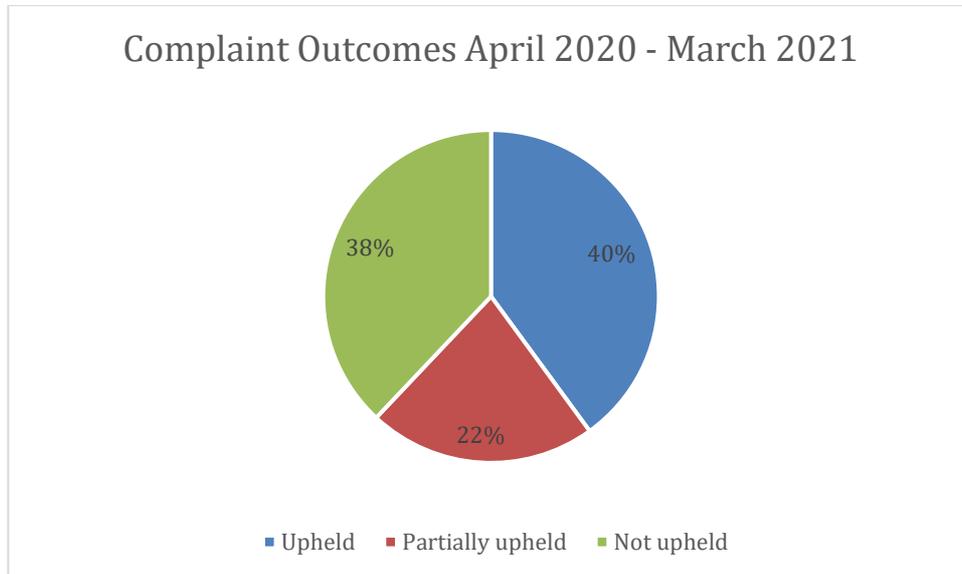
4.0 Professional Standards Authority

- 4.1 As outlined in 1.4, the PSA introduced a new standard which assesses how regulators address concerns identified through feedback and 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 The HCPC met Standard 4 in both the 19/20 and 20/21 PSA performance reviews.
- 4.4 The Service and Complaints Manager contributes to the PSA working group and is part of a Healthcare Regulators Complaint Forum.

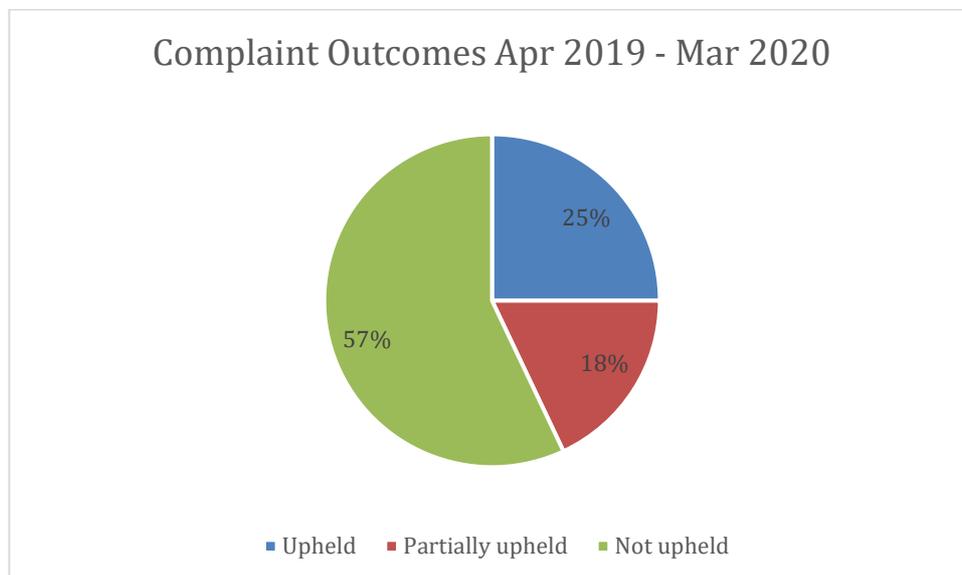
5.0 Complaint outcomes

- 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.
- 5.2 The majority of complaints (60%) during the review period were upheld or partially upheld. This is a significant increase on the previous period (43%) and is largely due to operational issues in the Registration department in the second half of the period.
- 5.3 For complaints which are not upheld, the complainant is provided with details of any relevant actions, policies and procedures relevant to their complaint so they can understand why actions have or have not been taken.
- 5.4 We closed 4 complaints without sending a reply. This was because the complainants withdrew their complaint.

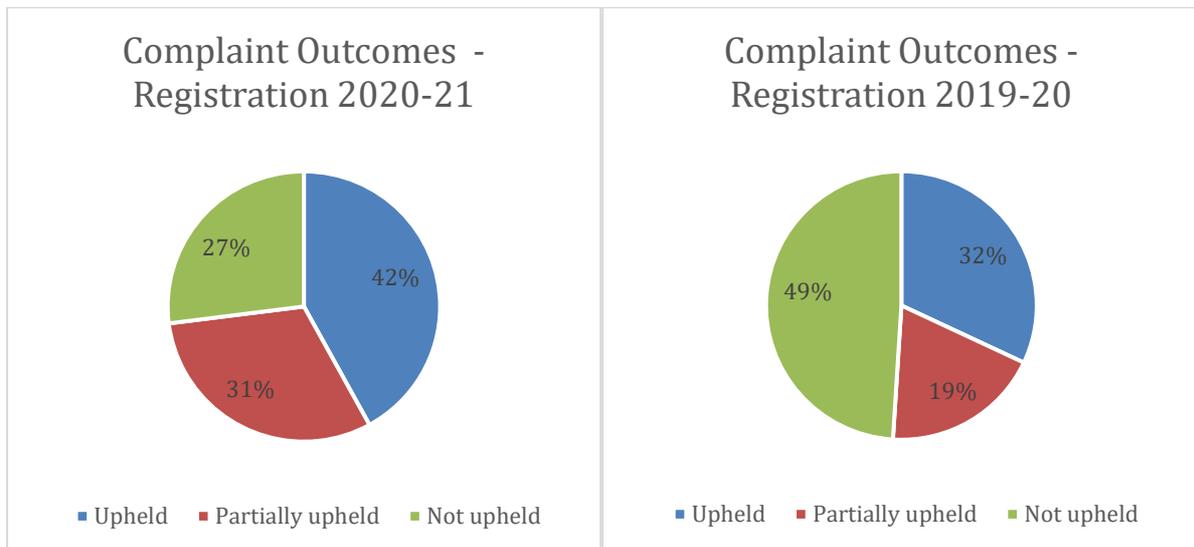
5.5 The graph below shows the distribution of outcomes across the organisation in the three categories during the period.



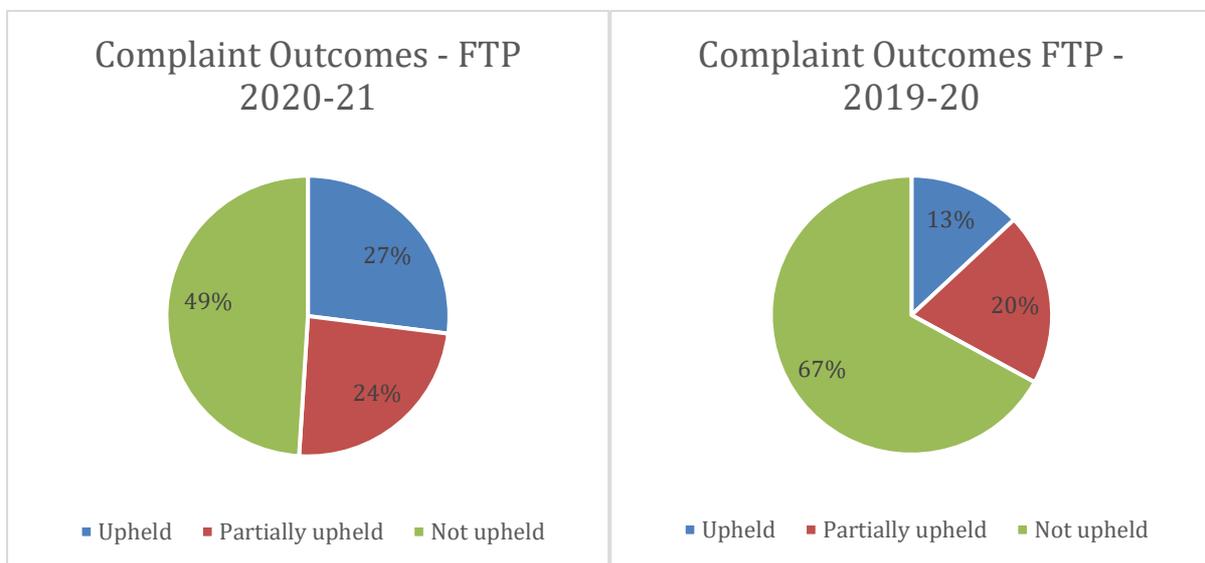
5.6 The graph below shows the distribution of outcomes in the three categories during the previous period.



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



5.8 The graphs below show 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) threshold decisions.** Complaints related to cases where the FTP Department had deemed a concern or concerns raised by the complainant against a registrant did not reach the threshold for referral to an Investigating Committee panel (ICP).
- **Communication.** Complaints received from parties in a case about a lack of updates from case managers
- **Case managers.** Complaints about changes in case managers and of not being informed of this.
- **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 met the threshold for referral to an ICP.
- **Registrant wellbeing.** Complaints relating to a lack of support for registrants during an investigation process.

6.2 HCPTS

- **Management of Hearings.** Complaints from registrants, complainants and witnesses about delays in the scheduling of hearings and of adjournments.
- **Conduct of hearings.** Complaints from parties about alleged bias against them and issues with panel members.
- **Decisions.** Complaints about decisions made being published.
- **Website.** Complaints about historic hearing decisions being recoverable through internet search engines.

6.3 Registration

6.3.1 The vast majority of complaints about the Registration Department come from applicants and registrants, but some also come from employers.

- **Registration renewal.** Registrants' main concerns were around difficulties accessing the new portal to complete online renewal. Registrants also complained that they did not receive email reminders of renewal and that we no longer sent renewal reminders by post.
- **Removal for direct debit issues.** Registrants' main concerns were that they did not get notifications of direct debit issues and the need to make payment or that the direct debit failure was not their fault.
- **UK applicants.** Applicants' main concerns were delays in registration due to pass list issues or a referral to FTP.
- **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 that documents they submitted had been lost.
- **Aptitude tests.** Applicants complained of an inability to do aptitude tests as the office was closed.
- **Communication.** Difficulties in getting through to the Department by telephone and delays in responding to emails.

6.4 Other departments

- **Direct debit mandates.** A number of complaints were received about a direct debit payment for fees being taken early.

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 A report on learning from complaints went to the Senior Management Team in October 2020 which identified themes and learning in complaints, corrective action undertaken and opportunities for improvement.

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

- Changes were made to the online renewal portal to give clearer instructions to applicants activating their account to complete renewal.
- A template was removed from the FTP case management system regarding a review of ICP decisions.
- An auto-response email was added to the pass list in box so that education providers know that the pass lists they have submitted have been received. Other auto-response emails were updated to reflect service issues.
- The Web team changed a link on the HCPC website following feedback from the College of paramedics.
- A telephone number for the Registration appeals team which was not operational was removed from the HCPC website.

7.4 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 Most learning from complaints is departmental specific. Two consistent themes identified which are cross-organisational are the tone and content of correspondence, and the negative impact on stakeholders when they are unable to contact the organisation by telephone.

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 52 pieces of positive feedback compared to 48 in the previous period. These included letters and emails thanking employees for many different activities across the organisation. We no longer log positive feedback from panel members for Hearing Officers so that all positive feedback recorded is from external parties although this is still passed on and celebrated.

9.2 The following are a some of examples of positive comments that we have received from stakeholders.

- Feedback from a college representing a profession for the 'amazing quantity of material sent to them to read and digest which would be incredibly helpful' to them. They appreciated how quickly it had been put together for them.
- Feedback from a registrant at a hearing for the Hearings Officer. 'Thank you for your kindness and patience you have shown over the last few days. You made the process much more bearable to manage in my mind.'
- Feedback from a vulnerable and unrepresented registrant at a hearing for the Hearings Officer. "Thank you for supporting my attendance. The reasonable adjustments you and the Panel made helped me access the proceedings."
- Feedback from a registrant regarding the information provided related to Covid-19 on the website. They say that they were very impressed with the easy to read information and to say thank you for it. They were particularly impressed by the down-to-earth, 'human' guidelines given in the 'protecting your well-being section'
- Feedback from an international applicant regarding staff in the Registration Department. They "specifically wanted to thank you and your staff through the difficulties of verifying my American credentials. I appreciate your tenacity in not giving up on me"
- Feedback from an education provider for the Education team regarding an approval visit that 'we found the 'visit' to be most helpful and really quite a smooth process. Our 'visitors' were all friendly and approachable, easy to discuss all the issues with. We felt valued, during the whole process, by everyone. We would like to thank you for this. This has truly felt like a partnership'.
- Feedback from an education provider regarding the website "Your website is a joy to use compared to many others. Thank you for making one bit of my life easy."
- Feedback from a private practitioner registrant for Policy regarding information related to Covid vaccination. "Thank you and your colleagues so much. I was so worried that I would fall through the net as a clinician working independently within the education sector - I am so grateful that the HCPC that this is not now the case and non-NHS staff are protected too."

- 9.3 Positive feedback is disseminated to employees and their managers when received.
- 9.5 During the period we have sought to raise awareness of positive feedback received and the fact that it is valued and recorded. Examples of positive feedback are given during all employee meetings where the recipients of the feedback are recognised. The increased amount of positive feedback being forwarded from across the organisation suggests that this has helped in capturing positive feedback that is being received.

10.0 Conclusion

- 10.1 We logged 448 complaints during the period 1 April 2020 to 31 March 2021. This is a significant reduction on the 568 logged during the previous period primarily caused by a drop off in complaints received in the 6 months following the introduction of the Covid 19 lockdown in March 2020.
- 10.2 The FTP and Registration Departments continue to receive the most feedback with 64% and 29% 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 98% of complaint responses were sent within the expected response time of 15 working days and only 7 complaints replied to missed that target during the period.
- 10.4 We logged 52 pieces of positive feedback for individuals and teams across the organisation in this reporting period.