

## 14 September 2022

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### Annual Review of Feedback and Complaints 2021-22

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#### Executive Summary

The attached paper provides an annual summary of the feedback received between 1 April 2021 and 31 March 2022. It breaks down the complaints received across the departments, detailing the performance against service standards, and identifying themes and learning.

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 the Executive Leadership Team.

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 majority of complaints due to the high number of customer interactions they undertake.

The Council monitor a KPI relating to complaints, being the percentage upheld, accompanied by narrative on the reasons for complaints in the reporting period.

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Previous consideration	This is an annual report. Quarterly reporting is included in the Internal Assurance report to the Committee.
Decision	The Committee is invited to discuss the report.
Next steps	The next annual report will be presented in September 2023. Quarterly reporting will continue at each meeting.
Strategic priority	Continuous improvement and registrant wellbeing.
Financial and resource implications	None as a result of this paper.
Author	Paul Robson, Service and Complaints Manager <a href="mailto:paul.robson@hcpc-uk.org">paul.robson@hcpc-uk.org</a>
Sponsor	Claire Amor, Head of Governance <a href="mailto:claire.amor@hcpc-uk.org">claire.amor@hcpc-uk.org</a>

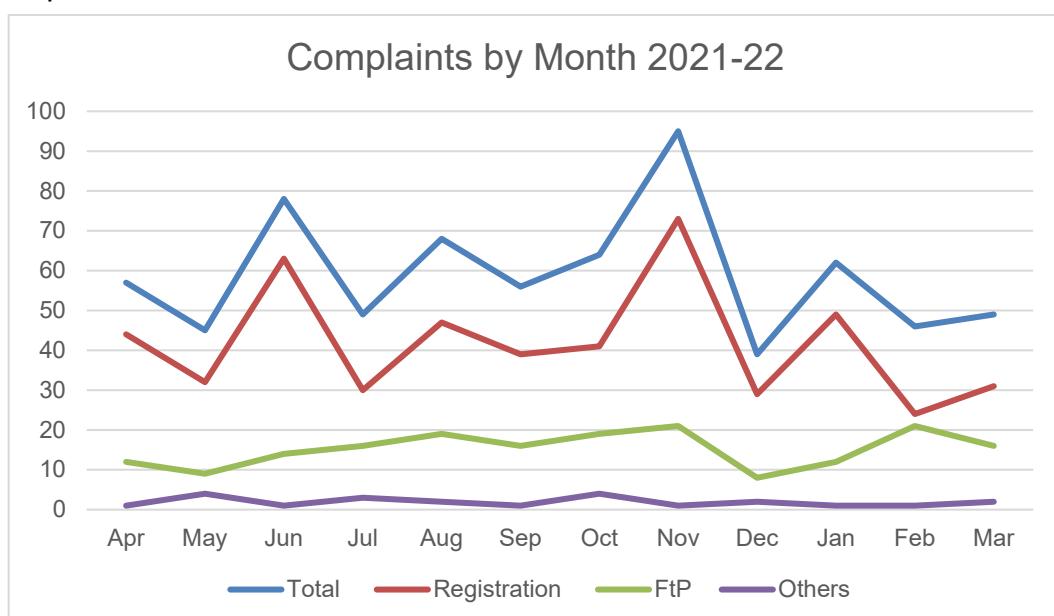
# Annual review of feedback and complaints 2021-22

## 1. Introduction

- 1.1 This report is a summary of complaints and feedback that the Health and Care Professions Council (HCPC) received between 1 April 2021 and 31 March 2022.
- 1.2 The Service and Complaints Manager manages the customer feedback received across the organisation in accordance with our Customer Service Policy and Process. Requests for information and general comments about processes and procedures are also logged and reported on.
- 1.3 This report provides a review of the complaints received during the period and the main themes in complaints and learning and changes made as a result of feedback. Some examples of positive feedback are also included.

## 2.0 Complaints received 1 April 2021 - 31 March 2022

- 2.1 708 complaints were received during the reporting period, an average of 59 per month. This compares with 488 complaints at an average of 37 per month during 2020-21 and represents a 45% increase.
- 2.2 The vast majority of complaints received were about functions and activities carried by the Registration and FtP departments, which received 71% and 26% of the complaints respectively. This compares to 64% and 29% of the complaints respectively in the previous period. While some registration service challenges were encountered in during the year, this also reflects the fact that these departments have the most interactions with registrants and other stakeholders.
- 2.3 The table below shows the number of complaints received each month by department.



- 2.4 Complaints about the Registration and FtP departments increased by 75% and 40% respectively during the period whereas complaints about other departments decreased by 28%. The latter reduction is mainly because fee related complaints which were previously replied to by Finance were replied to by Registration during the period.

### **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 596 complaints within our service level, which represents 84% of complaints to which we replied. This is a significantly less than the 98% replied to within service level during the previous reporting year. The deterioration in performance was largely down to the significant increase in complaints received which stretched the capacity of managers to respond during busy months, as well as stretching capacity, some backlogs in clearing correspondence meant that complaints were not forwarded on to the complaints service until the deadline had passed.
- 3.3 25 of the 59 complaints that Registration responded to outside service level occurred in one month. Despite this and the large volume of complaints they received, Registration responded to 88% of complaints within 15 working days. Similarly, 21 of the 56 complaints that FTP responded to outside service level occurred in two months, but their overall response rate decreased to 70% within 15 working days. Only 1 of 23 complaints received by other departments missed the 15 working day response time.
- 3.4 The mean response time during the period was 10 working days and the median response time 8 working days. This compares with the previous period of 7 and 8 working days respectively.
- 3.5 While the service level compliance challenges continued into 2022-23, service has improved and as of August, normal compliance has been achieved.

### **4.0 Professional Standards Authority**

- 4.1 In 2019-20 the PSA introduced a new standard focussing on regulators addressing concerns identified about it, including through feedback received from stakeholders. We have consistently met this standard and we record where we undertake changes as a result of feedback and provide evidence requested by the PSA when carrying out their annual review.
- 4.2 The Service and Complaints Manager contributes to the PSA working group and is part of a Healthcare Regulators Complaint Forum.

## **5. Learning from complaints**

- 5.1 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 and we seek to learn from what went wrong to prevent reoccurrence.
- 5.2 During this review period, a number of corrective actions and learning points have resulted from complaints or feedback. The following are examples:
- Changes were made to the online renewal portal to enable registrants to change their email address to activate their account and to update their registration on renewal without having to wait for a direct debit payment to be taken.
  - Changes were made to the online search the Register function to enable searches for hyphenated names where a gap between the names was entered.
  - A new email was set up in Registration for responses to enquiries about the use of protected titles and last practise date for readmission applications. Auto-responses were added to the PriorityReg and readmissions in-boxes.
  - The Web team changed a picture on the website relating to supervision.
  - A main telephone contact number for the HCPC was removed from the HCPC website and a link now directs users to a 'Contact us' page which links contact numbers for each department.
  - Changes were made on the website regarding controlled drugs to make clearer which can be prescribed by chiropodists and which by physiotherapists.
- 5.3 Most learning from complaints is departmental specific. A consistent theme which is cross-organisational is the tone and content of correspondence. This is being addressed through a tone of voice review. Another theme is the negative impact on stakeholders when they are unable to contact the organisation by telephone or get responses to emails.
- 5.4 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. Where feedback identifies serious systemic errors these are included in the near miss reports and improvement log.

## **6. Complaint themes**

- 6.1 This section provides further details about the main areas of negative feedback received during the review period. The themes of complaints have remained largely consistent with previous years.

### ***Fitness to Practise***

- 6.2 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 and of not being informed of a change in case manager.
  - **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.
  - **Case handling** Complaints from parties to an investigation that it has been outsourced to external solicitors.
  - **Readmission.** Complaints from applicants about the delays in dealing with declarations made in readmission applications which are referred to FTP.
  - **Registrant wellbeing.** Complaints relating to a lack of support for registrants during an investigation process.

### ***HCPTS***

- **Management of Hearings.** Complaints from registrants, complainants and witnesses about the scheduling of hearings and of adjournments.
- **Conduct of hearings.** Complaints from parties about the conduct of the hearing and issues relating to evidence.
- **Decisions.** Complaints about decisions being published, that they were inaccurate, or that they included sensitive information that should be made private.
- **Website.** Complaints about historic hearing decisions being recoverable through internet search engines.

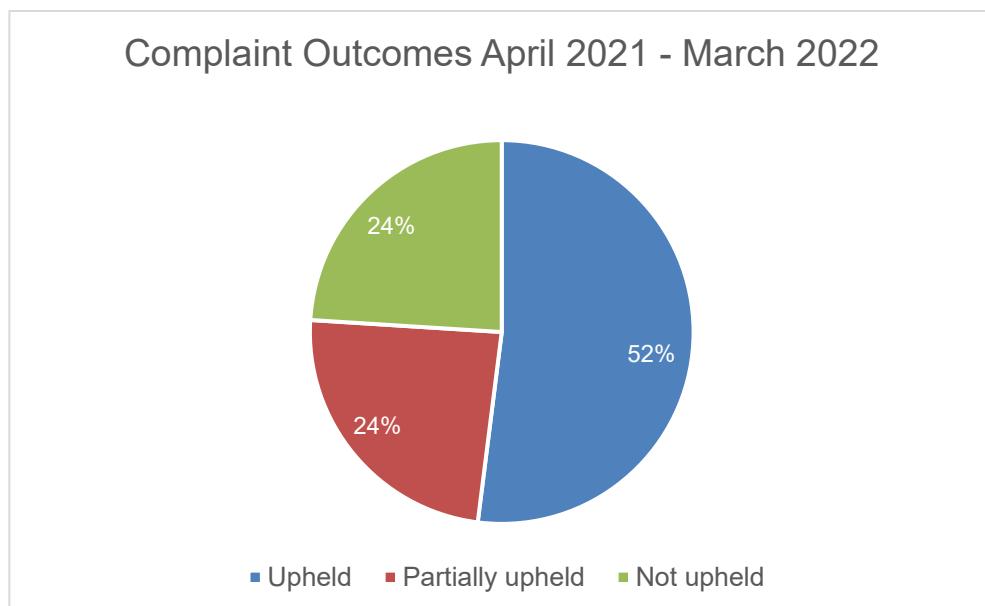
## **Registration**

- 6.3 The vast majority of complaints about the Registration Department come from applicants and registrants, but some also come from employers or prospective employers.
- **Registration renewal.** Registrants' main concerns were around difficulties accessing the 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.
  - **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 or not assigned to their application.
  - **Test of competence.** Applicants complained of delays in receiving the outcome of tests.
  - **Communication.** Difficulties in getting through to the Department by telephone and delays in responding to emails or in not getting a response.
  - **Refunds.** Delays in refunding overpayments or refunds due on voluntarily deregistering.
  - **Data breaches.** Applicants and registrants receiving communication intended for someone else.

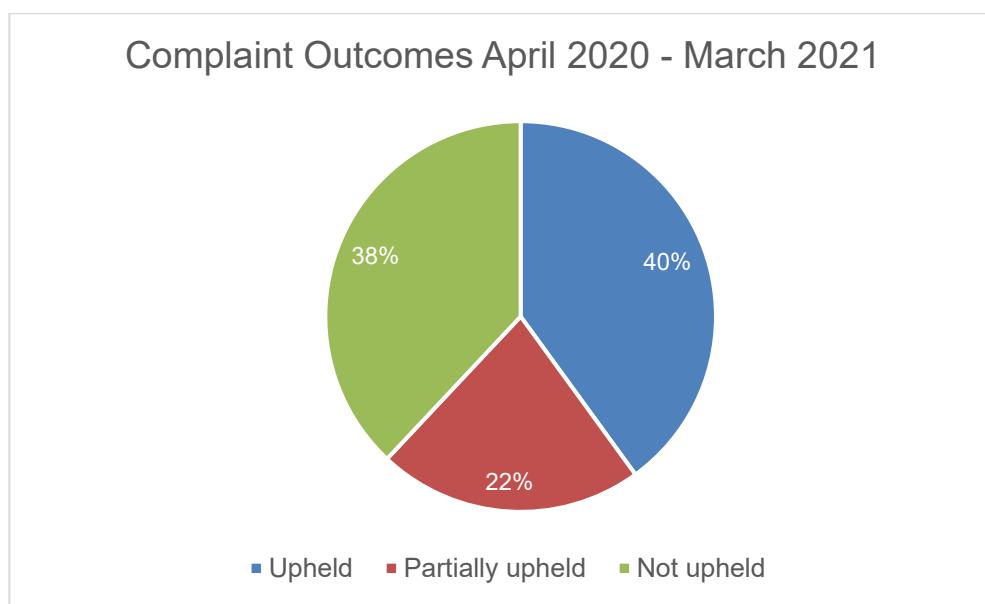
## **7. Complaint outcomes**

- 7.1 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 Compliance team undertakes an annual audit of the consistency of the determinations made for assurance.
- 7.2 The majority of complaints (76%) during the review period were upheld or partially upheld. This is an increase on the previous period (60%) and is largely due to operational issues in the Registration department and in particular relating to international applications and communication issues.

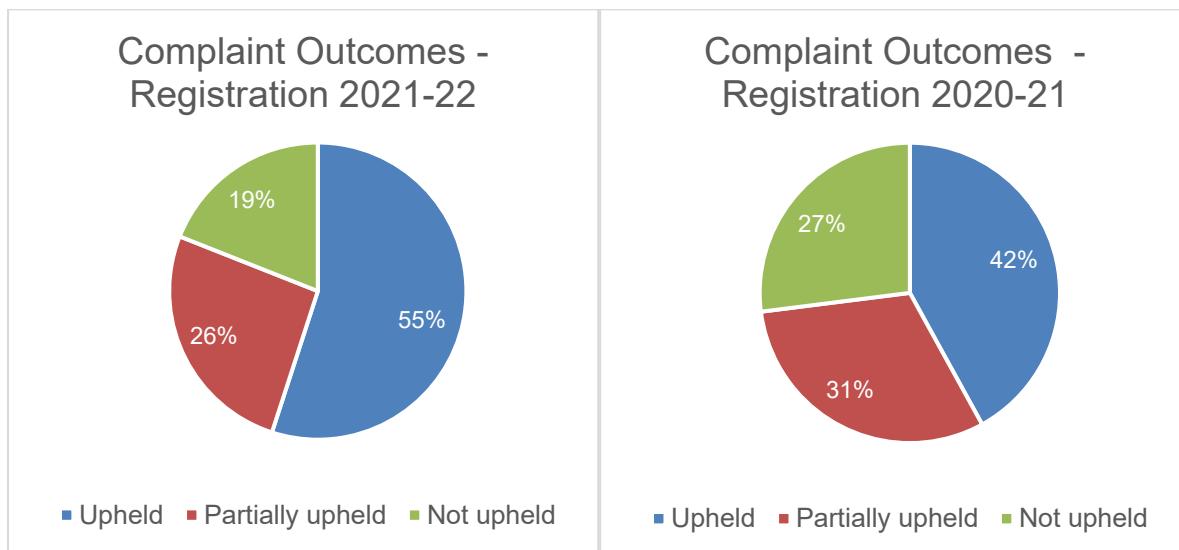
- 7.3 For complaints which are not upheld, the complainant is provided with details of any relevant actions, policies and procedures relevant to their complaint so they can understand why actions have or have not been taken.
- 7.4 We closed 3 complaints without sending a reply. This was because the complainants withdrew their complaint.
- 7.5 The graph below shows the distribution of outcomes across the organisation in the three categories during the period.



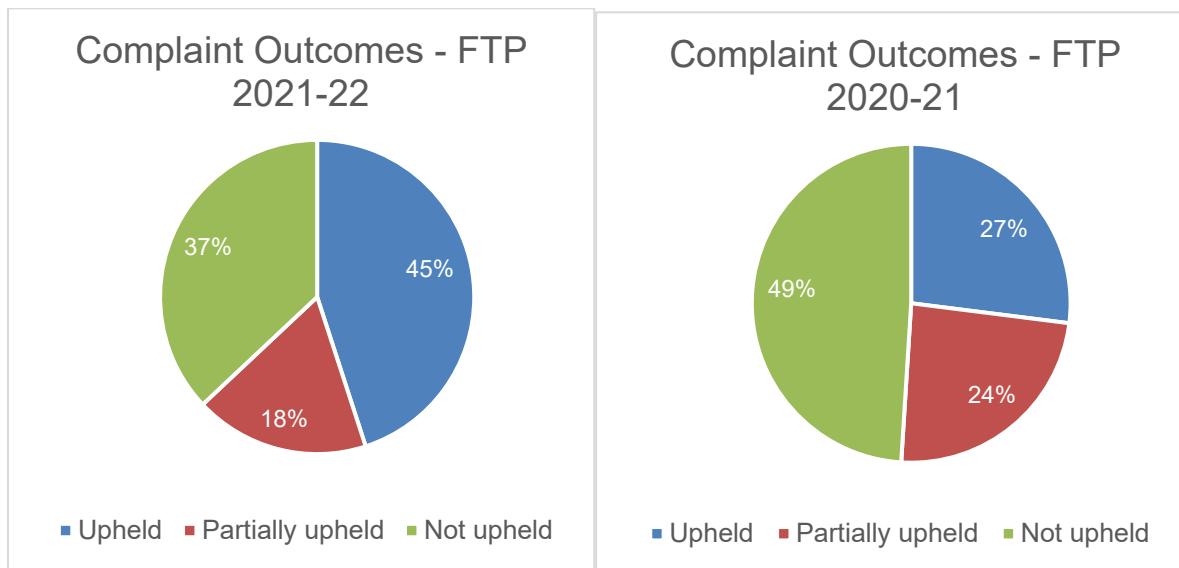
- 7.6 The graph below shows the distribution of outcomes in the three categories during the previous period.



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



- 7.8 The graphs below show the distribution of outcomes for FTP complaints during the period of this report and the previous period.



## **8.0 Positive feedback**

- 8.1 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 105 pieces of positive feedback which is a significant increase on the 52 received in the previous period. This reflects both the high level of stakeholder interaction during the period and an increased awareness across the organisation that such feedback is recorded, as it is disseminated on a monthly basis. The feedback includes letters and emails thanking employees for many different activities across the organisation.
- 8.2 The following are some examples of positive comments that we have received from stakeholders.
- Feedback from a witness at a hearing for a Hearings officer. 'Many thanks, and for helping to put me at ease as you did from the start. It's impressive to see how HCPC conducts such a panel and all the thought and professionalism that goes into it.'
  - Feedback from a registrant subject to an investigation for the case manager. 'I would like to take this opportunity to thank my case manager as the last two years have been exceptionally difficult and anxiety-ridden. Yet she has been patient and offered support when need. This process would have felt completely lonesome if it were not for her.'
  - Feedback from a Welsh Government department regarding information we provided about Allied Health Professionals. 'Thank you so much, you and your team are amazing, we really appreciate it.'
  - Feedback from attendees at a Clinical Governance event about a presentation. They said 'Your session was really marvelous. It was such an interactive couple of hours and staff were clearly engaged throughout. It set the day up so well and gave a super momentum for the subsequent sessions. We learned a lot from watching you present, and everyone commented on how you kept the participation and interest going. At the end when asked 'what was the most useful part of the day' the resounding answer was the HCPC session!'
  - Feedback from an applicant seeking readmission to the Register. 'Can't thank you enough for getting involved here, the stress on the family has been intense for sure. Thanks again for everything you have done for my family and I, it means more than you know especially in today's uncertain world.'
  - Feedback from registrants on Twitter from two registrants about the reflective practise web content. 'Some really useful information and templates to use in #supervision or as part of learning and development' and 'I also like the way that @the\_HCPC highlight what is and isn't

reflection how it is a process that can be undertaken alone, also shared with others & that the impact on practise/service users is explicit. Also that employers/managers are encouraged to support staff to reflect.'

- Feedback from an international application about the handling of a declaration they made. 'I want to thank you for your professional and effective manner in which you dealt with my case. From the start the service was of the highest standard, as you kept me up to date every step of the way.'
  - Feedback from a visitor on an education training day. 'Thank you for such an interesting and informative day. To cover what you have – online and with such a diversity of practitioners is quite an achievement! I think this is an exciting development not just for the HCPC, but the wider communities of Higher Education Institutes, Professional bodies and employers. I see the patient/public though as truly being at the heart of this.'
- 8.3 Positive feedback is disseminated to employees and their managers when received. A personal thank you from ELT is sent to the person named in the positive feedback using our feedback and rewards system.
- 8.4 During the period we have continued to increase awareness of positive feedback received and the fact that it is valued and recorded. Examples of positive feedback are given during all employee meetings and are included in blogs from ELT members. 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.

## **9.0 Conclusion**

- 9.1 We logged 708 complaints during the period 1 April 2021 to 31 March 2022. This is a significant increase on the 448 logged during the previous period primarily caused by an increase in complaints received about the Registration department.
- 9.2 The FtP and Registration Departments continue to receive the most feedback with 71% and 26% of the complaints received respectively, which is to be expected as these Departments have the most individual interactions with registrants and other stakeholders.
- 9.3 84% of complaint responses were sent within the expected response time of 15 working days.
- 9.4 We logged 105 pieces of positive feedback for individuals and teams across the organisation in this reporting period which is double the amount for the previous period.