

Council 4 December 2014

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 this 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 April 2014 and 30 September 2014. 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.

In September 2014, the EMT agreed to amend the complaint process to a three stage model. The process includes a review of the complaint and response by the Service and Complaints Manager and a member of the EMT if this requested by the complainant. The aim of a review is to ensure that the complaint has been handled in line with our complaint and departmental policies and processes and that appropriate learning points have been taken and implemented.

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

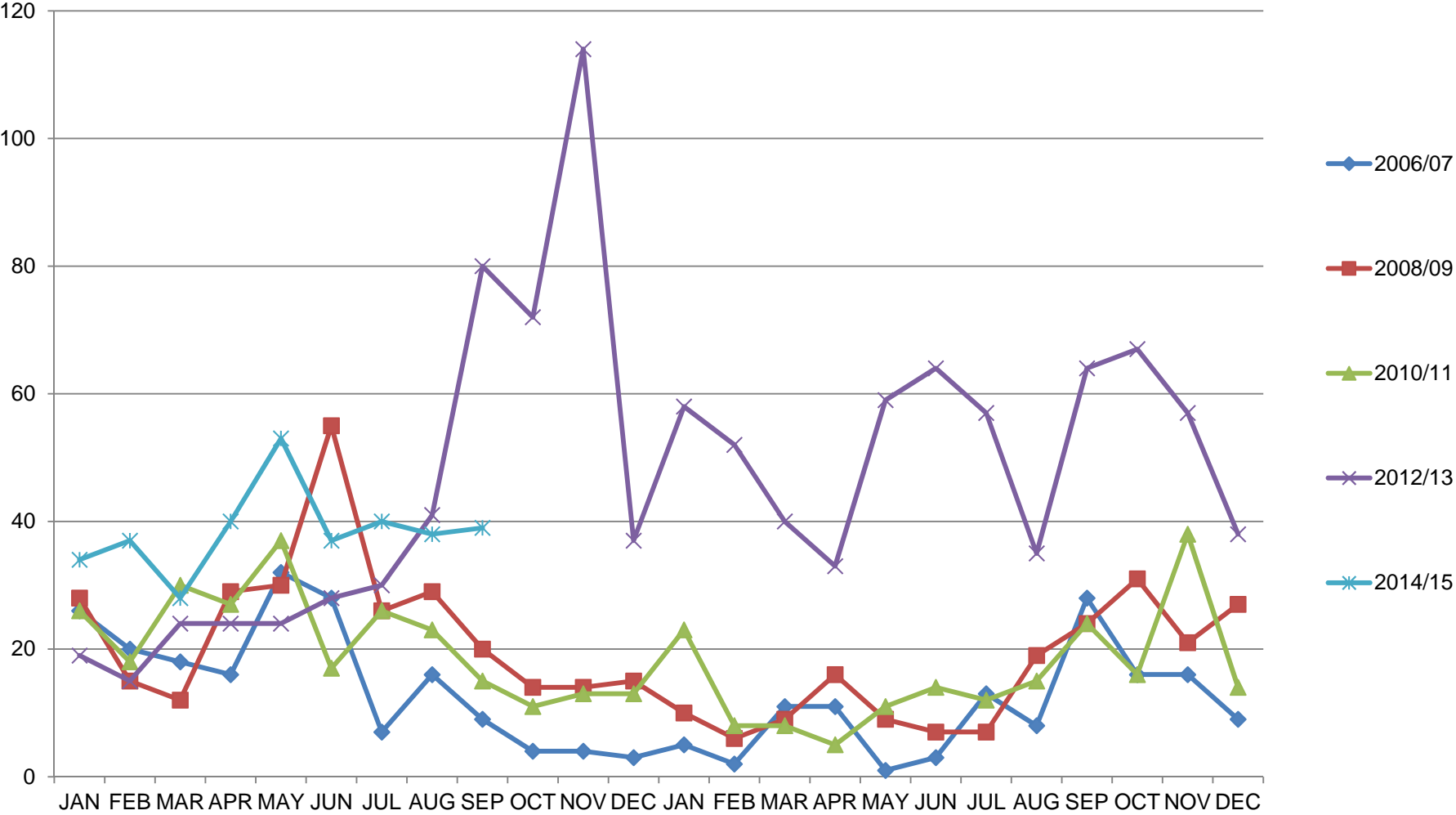
12 November 2014

1.0 Background information

- 1.1 The Health and Care Professions Council (HCPC) has been operating 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 notable 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 Executive Management Team receive a monthly report 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 April 2014 to 30 September 2014), 247 complaints were logged 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. 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.
- 1.6 The following graph shows the monthly distribution of complaints logged from January 2006 to September 2014. 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.
- 1.7 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, these departments are Registration

and Fitness to Practise. The HCPC receives relatively few complaints compared with the number of transactions carried out; for example, during the review period the Registration team processed 11,989 new UK applications and seven professions were in renewal.

Distribution of complaints received across two year cycles



1.6 During the review period (1 April 2014 to 30 September 2014) there was a peak in the number of complaints received in May 2014. This peak occurs at the same point as the closing of the renewal window for physiotherapists (the second largest profession) and subsequent readmission. A larger number of complaints are often received across the summer months about the UK application process as this is the peak time for processing applications from new graduates, it is notable that this has not occurred during this reporting period.



1.7 The table below shows the number of complaints received in the last nine financial years.

Financial year	Number of complaints
2006/7	137
2007/8	160
2008/9	257
2009/10	235
2010/11	221
2011/12	207
2012/13	601
2013/14	573
2014/15	247 at 30/9

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.

	April to September	October to March
2006/07	108	29
2007/08	64	96
2008/09	189	68
2009/10	82	153
2010/11	145	76
2011/12	81	126
2012/13	227	373
2013/14	312	261
2014/15	247	

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 247 complaints. We responded to 228 complaints within our service level of 15 working days, which represents 91 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 complaint requiring a 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 247 complaints. The table below shows how many complaints each department responded to.

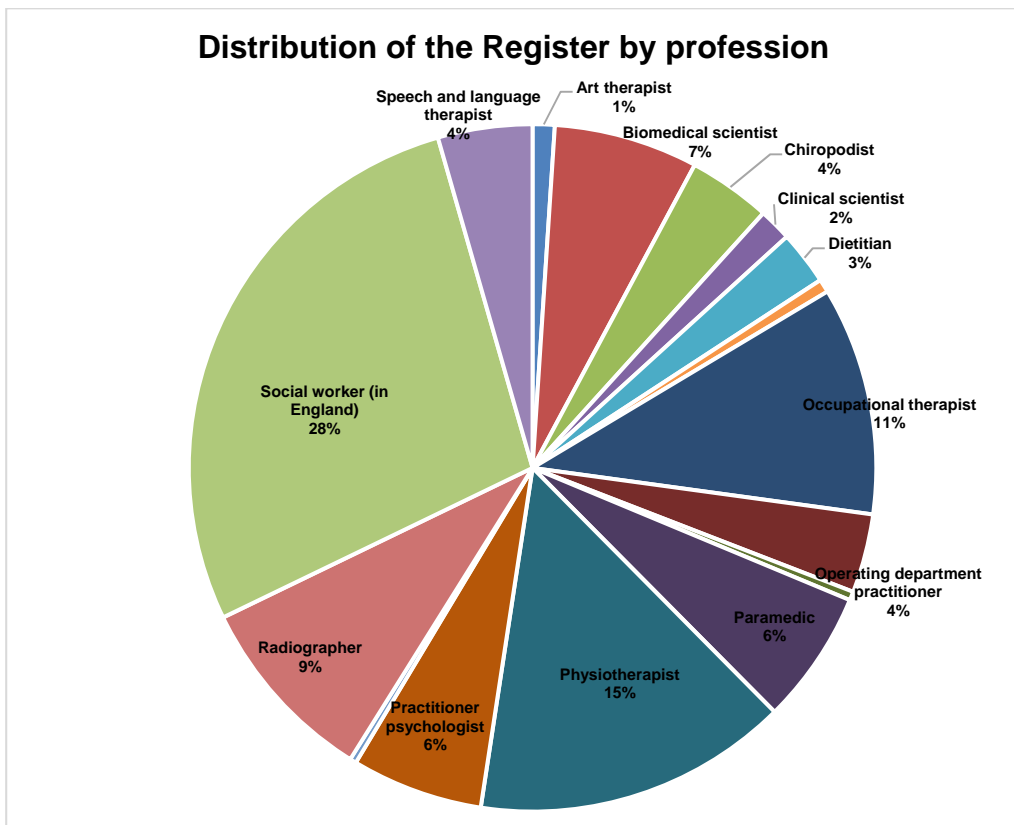
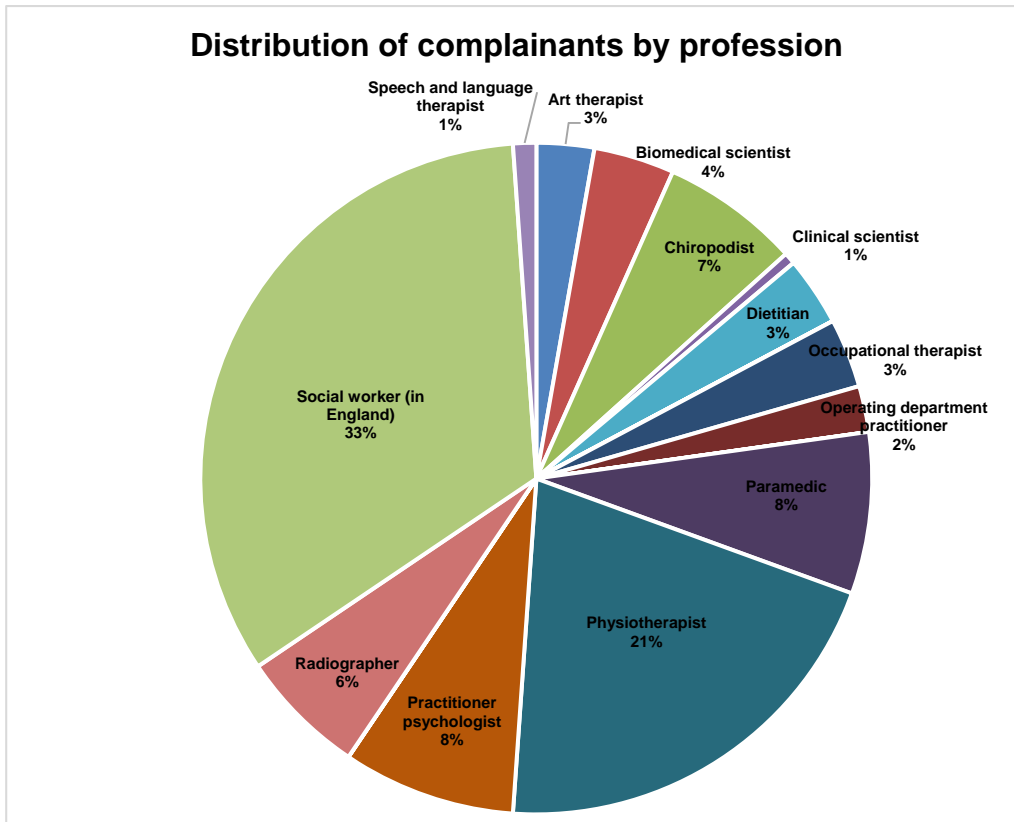
Department	Number of complaints
Chief Executive	1
Communications	4
Education	3
Facilities	2
Finance	4
Fitness to Practise	106
Partners	3
Policy and Standards	3
Registration	119
Secretariat	2
Total	247

3.2 During the review period, we received 180 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*	5	1.5
Biomedical scientists	7	0.3
Chiropodists / podiatrists*	12	0.9
Clinical scientists	1	0.2
Dietitians*	6	0.7
Hearing aid dispensers*	0	0
Occupational therapists	6	0.2
Operating department practitioners*	4	0.3
Orthoptists	0	0
Paramedics	14	0.7
Physiotherapists*	37	0.8
Practitioner psychologists	15	0.7
Prosthetists / orthotists	0	0
Radiographers	11	0.4
Social workers in England*	60	0.7
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. For most professions, the percentage of total complaints received was broadly comparable to their percentage size on the Register, although there is a larger variation during this reporting period than there was during the last one. For example social workers make up 27.7% of the entire Register and 33.3% of complaints that we logged were from social workers, last reporting period social workers made up 27.6% of the entire Register and 26.1% of complaints were from social workers.

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

	% of complaints	% of Register	Ratio of % complaints to % of Register
Arts therapists*	2.8	1.0	2.7
Biomedical scientists	3.9	6.8	0.6
Chiropodists / podiatrists*	6.7	3.9	1.7
Clinical scientists	0.6	1.5	0.4
Dietitians*	3.3	2.6	1.3
Hearing aid dispensers*	0	0.6	0
Occupational therapists	3.3	10.7	0.3
Operating department practitioners*	2.2	3.7	0.6
Orthoptists	0	0.4	0
Paramedics	7.8	6.3	1.2
Physiotherapists*	20.6	14.8	1.4
Practitioner psychologists	8.3	6.2	1.3
Prosthetists / orthotists	0	0.3	0
Radiographers	6.1	8.9	0.7
Social workers in England*	33.3	27.7	1.2
Speech and language therapists	1.1	4.4	0.3

3.5 The last column 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 whole Register. A number larger than 1.0 represents a larger representation of a profession within the complaints data, and conversely, a figure lower than one 1.0 shows that the profession complained relatively less.

3.6 Arts therapists had a ratio of percentage of complaints to percentage of the Register which was much higher than 1.0 and much higher than other professions, this is due to the small size of the profession and only represents 5 complaints.

3.7 No complaints were logged from hearing aid dispensers, orthoptists and prothetists / orthotists which are the three smallest professions on the Register and each represent less than 1% of the total 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
April	40	<ul style="list-style-type: none"> • Refunds of registration fees • Pre-ICP / Standard of acceptance decisions 	Registration - 19 Fitness to Practise - 13 Communications - 4 Education - 2 Finance - 1	93%	HCPC 29% Reg 13% N/A 58%
May	53	<ul style="list-style-type: none"> • Default date of birth correction mailing • Renewal documentation and reminders • Pre-ICP / Standard of acceptance decisions 	Registration - 31 Fitness to Practise - 20 Finance - 2	94%	HCPC 36% Reg 4% N/A 60%
June	37	<ul style="list-style-type: none"> • Renewal documentation and reminders • Time taken to provide a decision on the outcome of international applications • Pre-ICP / Standard of acceptance decisions 	Registration - 21 Fitness to Practise - 14 Facilities - 1 Partners - 1	76%	HCPC 30% Reg 5% N/A 65%
July	40	<ul style="list-style-type: none"> • Time taken to provide a decision on the outcome of international applications • Pre-ICP / Standard of acceptance decisions 	Fitness to Practise - 21 Registration - 16	100%	HCPC 53%

			Policy and Standards - 1 Finance - 1 Partners - 1		Reg 2% N/A 45%
August	38	<ul style="list-style-type: none"> Registration fee policies - no refund of final renewal instalment, no reduced fee for maternity leave Pre-ICP / Standard of acceptance decisions 	Fitness to Practise - 18 Registration - 15 Secretariat - 2 Education - 1 Facilities - 1 Policy and Standards - 1	89%	HCPC 19% Reg 0% N/A 81%
September	39	<ul style="list-style-type: none"> Registration fees - HCPC fee in comparison to the GSCC fee Pre-ICP / Standard of acceptance decisions 	Fitness to Practise - 20 Registration - 17 Partners - 1 Chief Executive - 1	92%	HCPC 26% Reg 2% N/A 72%

Total number of complaints: 247

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 fees and payment issues – social workers; by the beginning of the review period, most of the previous issues relating to the transfer of social workers to the HCPC Register and the closure of the General Social Care Council (GSCC) had been dealt with, however with the opening of the renewal window for social workers (1 September 2014 to 30 November 2014), we received a much smaller but notable amount of feedback related to registration fees and payments, complaints were received about:
- The HCPC registration fee; the GSCC was heavily subsidised by the government, and charged a registration fee of £30 per year. Some social workers complained that the HCPC registration fee is significantly more.
 - Some social workers had general complaints and queries about the schedule of their registration fee direct debit payments.
- 5.3 Registration fees and payment issues – other policies, complaints have been received about:
- Not charging a reduced registration fee for registrants on maternity leave, other types of leave and those who work part-time.
- 5.4 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. Complaints have been received about:
- The policy of removing registrants from the Register
 - The necessity to complete and return a readmission form
- 5.5 Online renewal portal – registrants are encouraged to use the portal to keep their personal details up to date and to renew their registration. Complaints have been received about:
- Arrangements for the generation of security codes for accessing the online portal.
 - The online renewal portal interface.
 - Date of birth records, some registrants details had not been passed on to HCPC from CPSM, this prevented some registrants from renewing using the online portal.
- 5.6 International application process – the process consists of 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 16 weeks. Complaints have been received about:

- Time taken to assess application forms
- Time taken to complete the verification process and associated administration
- EEA mutual recognition rights

5.7 Employer reminder letters – the employer reminder letter is sent to registrant's employers shortly before the end of the renewal window if a registrant has not renewed their registration; this allows the employer to remind the registrant about renewing. Complaints have been received about:

- Writing to employers
- The tone and content of letters

5.8 Intermediate removal – the intermediate removal process is run if registrants do not maintain their registration payments. Registrants are written to twice to ask them to make a payment and they are removed from the Register if this payment is not made. Complaints have been received about:

- Contacting registrants regarding payments - not telephoning or emailing registrants about missed payments
- The policy of removing registrants from the Register

5.9 Registration department telephone number – an 0845 number was put in place several years ago to ensure that anyone in any part of the country could telephone the department for the cost of a local call; we do not generate a revenue from the use of this number. Complaints have been received about:

- The cost of calling an 0845 number

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. Complaints have been received about:

- HCPC not deeming a concern/s 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 HCPC identify where there may be problems with processes or policies, complaints are classified according to where the error that caused the complaint occurred.

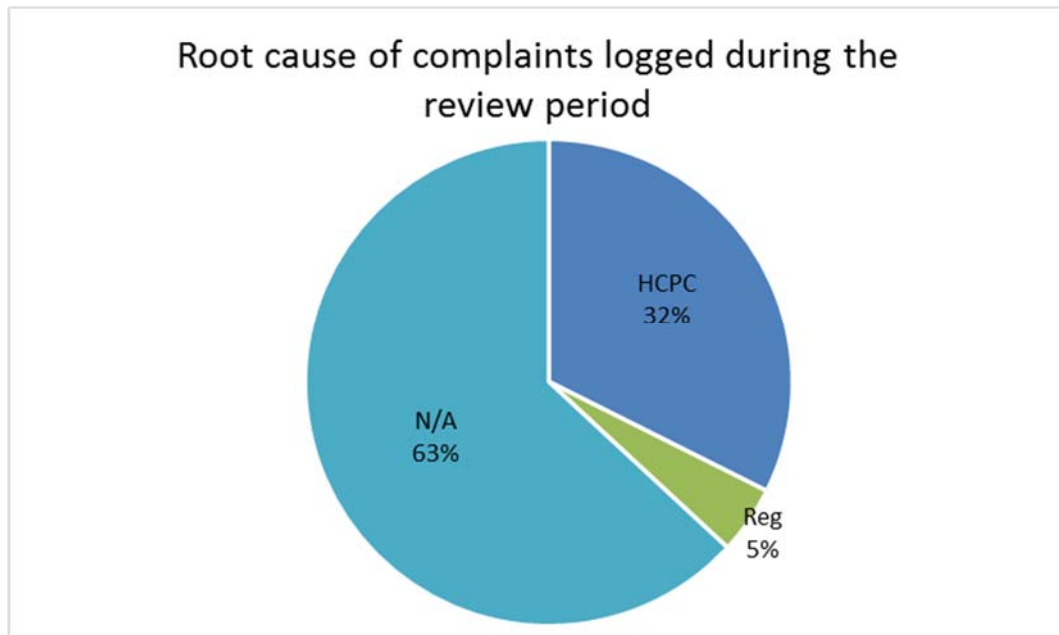
6.2 Three groups are used to classify complaints, they are:

- 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 – 79 complaints
- Registrant / applicant – 11 complaints
- N/A – 154 complaints

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



This distribution is almost identical with last year's (financial year 2013/14) which was:

- HCPC - 33%
- Applicant / registrant - 6%
- N/A - 61%

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.

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 Finance, 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.
- Where date of birth records hadn't been passed to us by CPSM, registrants were written to again to ask them to submit certified documentation so that their record could be updated and they could use the online portal.
- The telephone systems may be changed to incorporate the use of telephone numbers starting with "03" and removing the "0845" number that the Registration department use. These numbers will be geographic and are included in most mobile telephone packages.
- Fitness to Practise continue with a review of their standard template letters, starting with the most frequently used ones.
- 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.

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 91 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 praise from registrant's thanking 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 for the Peterborough Meet the HCPC event, the registrant found the presentation on professionalism particularly interesting and the group discussion made him reflect on his personal practise.
- Positive feedback from an employer for a Registration Manager's response to an issue, he thanked her for taking the time to investigate and respond to the issue and would be implementing all the manager's suggestions.
- Positive feedback about a Case Manager for her management of an FTP case, the registrant commented that the employee had conducted a thorough investigation while remaining neutral and that she is a credit to the organisation.

8.3 During the last six months, extra emphasis has been put on employee positive through the organisational "thank you" article which is included in the monthly employee HCPC Update publication. The article highlights some of the positive feedback that is included in the customer service report.

8.4 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.

Review period	Number 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	58 (to September)	

9.0 Conclusion

- 9.1 The number of complaints logged during this reporting period was in line with the last reporting period. There was a slight decrease in the number of complaints logged.
- 9.2 The distribution of complaints received were fairly balanced across the professions on the Register.
- 9.3 Overall, the HCPC receives a relatively small number of complaints relative to the number of transactions that are carried out across the organisation.
- 9.4 We continued to put a stronger emphasis on corrective action within the last year, with regular review meetings with managers to look at complaint reporting and identify areas to improve.
- 9.5 We continued to receive a large amount of positive feedback in the last year. An extra emphasis has been placed on publicising positive feedback within the organisation.
- 9.6 The next report will cover the period 1 October 2014 to 31 March 2015.