

management response to the independent assessor's annual report 2017/2018

Chris McDermott, chief operating officer

I am grateful to the independent assessor not only for her report, but also for the valuable insights and recommendations she provided throughout the year. We strive to provide a service that we are proud of, and to put things right and learn the lessons when things go wrong. We very much value her independent viewpoint to help us keep learning and improving, and in the past year we have accepted all of her recommendations.

complaints about our service

The table below sets out the cases resolved by the ombudsman service and service complaints we have responded to over the last three years. Although it is to be welcomed that the number of service complaints has reduced compared to previous years, in absolute numbers and as a percentage of the number of cases we resolved, there is clearly more work to be done to reduce this number further.

year	2015/2016	2016/2017	2017/2018
cases resolved	438,802	336,381	400,658
service complaints			
total	3,339	2,825	2,501
as a % of cases resolved	0.76%	0.84%	0.62%
independent assessor			
service complaints reviewed	411	437	405
designated satisfactory or adequate	214 (52%)	262 (60%)	219 (54%)
designated critical	197 (48%)	175 (40%)	186 (46%)
<i>of which</i>			
designated critical with recommendations	119 (29% of total)	87 (20% of total)	85 (21% of total)

Service complaints that are designated as *critical with recommendations* are those where there have been service failures that were not corrected before reaching the independent assessor.

top three themes

As outlined in her report, the top three themes for service complaints reviewed by the independent assessor – reflecting the nature of the concerns people raised with her to look into – were *communication*, *adherence to process* and *fairness and impartiality*. The table below provides a breakdown of these top three themes.

top three complaint themes 2017/2018	number of cases	percentage of the total reviewed
communication	135	33%
adherence to process	76	19%
fairness and impartiality	62	15%

theme one – communication

Cases reviewed by the independent assessor about *communication* were as follows:

cases reviewed	135
cases designated critical	76 (56%)
cases with recommendations	43 (32%)

Although it is disappointing that the independent assessor found 56% of these complaints to be critical, 68% were either satisfactory or had been corrected before reaching the independent assessor.

Good communication is a crucial part of our work – and it is something we continue to focus on with quality-checking, knowledge-sharing and regular training. We have done a considerable amount of work to improve our communications over the last year, including workshops around our organisational tone of voice and training sessions with the Money Advice Trust. There is further training planned, especially around effective communication using the phone – as we make increasing use of this channel in our new ways of working.

The independent assessor highlighted that some consumers had experienced different journeys with their cases. This is a reflection of the different approaches we take in our investigation teams compared with where we have mass-scale complaints, involving large volumes of cases. We attempt to make clear to consumers the particular path they will follow, but acknowledge that for some customers with multiple cases across

different areas of casework, the experience may feel slightly different. We will continue to aim to keep our customers better informed in this respect.

theme two – adherence to process

Cases reviewed by the independent assessor concerning *adherence to process* were as follows:

cases reviewed	76
cases designated critical	45 (59%)
cases with recommendations	19 (42%)

During the past year we have trialled a new process for investigating service complaints, to provide our customers with a more straightforward, and quicker journey for getting their concerns resolved. The success of the trial led to us to roll it out to all areas of our casework. However, for some people – particularly those who had previously used, and were familiar with, our old service complaints process – we acknowledge that this might have caused some confusion in the intervening period. We have now updated our factsheets and website to ensure they reflect our new service complaints process.

theme three – fairness and impartiality

Cases reviewed by the independent assessor concerning *fairness and impartiality* are as follows:

cases reviewed	62
cases designated critical	8 (13%)
cases with recommendations	0 (0%)

Our aim is to provide a service that feels fair. Of the 62 complaints that were reviewed by the independent assessor, eight cases were classified as critical. We note that the independent assessor found no instances of bias and was satisfied with how we'd addressed all of these complaints, including the steps we had taken to put things right.

It is understandable that people are disappointed when they don't get the answer they initially hoped for when they contacted our service. We encourage our case handlers to talk to our customers about their case to help them understand why we have reached the outcome that we have. Our case handlers send their opinion in writing – so that our customers have a record of what we have said. This is something we feel is helpful, and

is also a requirement of the Alternative Dispute Resolution regulations. It is encouraging that 50% of consumers whose complaints we didn't uphold in 2017/2018 still said they were satisfied with the service they had received.

The parties involved in complaints can send us a lot of information. While we consider everything we receive, some information may be more relevant than other information in reaching our answer about the case in hand. Our case handlers are also encouraged to share the material evidence that has helped them to reach their view – although we recognise there is still room for improvement here. When it is launched later this year, our portal will enable customers to log in securely online to view information that is material to their case.

small respondent businesses

Cases reviewed by the independent assessor relating to *small respondent businesses* – typically small businesses with few complaints with us - are as follows:

cases reviewed	6
cases designated critical	4 (67%)
cases with recommendations	3 (50%)

The independent assessor assessed six service complaints from small respondent businesses and made recommendations in three of these. Although this is a relatively small number, we are aware that small businesses don't have the same resources at their disposal as the larger ones we deal with. In order to assist them, our technical helpdesk and stakeholder engagement teams work to support small businesses with general queries about our service and our approach via face-to-face engagement and through channels such as our newsletter, *ombudsman news*. More work is planned for the coming year to engage with businesses that have not had much contact with our service.

Over the past year our technical helpdesk received over 19,000 enquiries, 1,410 of which came from smaller businesses. We provided information about our processes – how we work and what businesses should expect – as well as other support with technical and jurisdiction issues. We also regularly provide updates to case handlers on how we can best support our smaller business customers, recognising that complaints can have a big impact on them. Specific information for small businesses is also available on our website.

We have taken on board the feedback from the independent assessor on these cases. The lessons learnt have been shared by way of case studies, which are available to our case handlers on our intranet.

vulnerable customers

Cases reviewed by the independent assessor relating to *vulnerable customers* are as follows:

cases reviewed	50
cases designated critical	21(42%)
cases with recommendations	15 (30%)

We expanded our work to identify and support vulnerable customers last year and are indebted to the Money Advice Trust for their valuable assistance with the training that was provided to our case handlers. This helped us identify more customers experiencing vulnerability: our accessibility team received 632 calls for advice from case handlers, compared to 275 calls the previous year. In response to this increase in demand, we expanded our accessibility team to provide more support.

Over the past year we also updated our guidance for all staff to support them when met with unreasonable behaviours from our customers. We will be building on this with the help of training and focused discussions throughout the coming year. We have recently brought together a network of colleagues into a practice group, to consider improvements we can make for customers, especially those in vulnerable circumstances.

investigation pods

We are encouraged by the independent assessor’s comments about the new ways of working in our investigation pods – that they provide a smoother journey for customers and a more personable relationship between our customers and colleagues dealing with their cases.

cases reviewed	138
cases designated critical	57 (41%)
cases with recommendations	29 (21%)

The independent assessor has reviewed 138 cases from the investigation area. Of these, 57 cases were classified as critical. We've taken on board what we can learn from these complaints and continue to use this feedback to develop our people and our processes.

new service complaints process

As mentioned previously, we are pleased with the successes of our new service complaints process and we are now rolling this approach out across the service.

summary

As an organisation committed to learning and improving, we greatly value the independent assessor's feedback. We look forward to completing the roll-out of our new process for service complaints and launching our new portal to give better visibility to our customers about the details and progress of their cases.

annex A – further information

service complaints

Service complaints are received at case-handler level and/or at senior-manager level. The table below provides a breakdown of this data.

	2015/2016	2016/2017	this year
cases resolved	438,802	336,381	400,658
service complaints received at case-handler level	2,202	1,932	2032
service complaints received at senior manager level	1,137	893	469
total service complaints	3339	2825	2,501
service complaints as a % of cases resolved	0.76%	0.84%	0.62%

sectoral data

The table below illustrates that service complaints were broadly in line with new cases received by sector. No one sector stands out as an area of particular concern.

area	% of new cases	% of service complaints
banking	58%	56%
insurance	30%	29%
investments	7%	9%
pensions	4%	5%