



Contextualising Complaints Data

**Thursday, 5 July 2018, 15:00 to 17:00,
ORR Room 1, One Kemble Street,
London, WC2B 4AN.**

Agenda

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|---|---------------|
| 1. Welcome and introduction
<i>Sarah Chambers, LSCP Chair</i> | 15.00 – 15.05 |
| 2. Complaints data, a quality indicator of benefit to consumers
<i>Sarah Chambers, LSCP Chair</i> | 15.05 – 15.15 |
| 3. Lessons from the health sector
<i>Warren Seddon, Director of Strategy and Insight,
Parliamentary and Health Service Ombudsman</i> <ul style="list-style-type: none">- The publication of complaints data in the health sector- Using complaints data to drive improvements- Transparency in Ombudsman's decision- Q&A | 15.15 – 15.45 |
| 4. Contextualising complaints data
<i>Andrew Ward, Principal, Consumer Policy at Ofcom</i> | 15.45 – 16.10 |

- Experience of publishing complaints data in the telecoms sector
- Benefits, incentives and issues raised by the publication of complaints data
- Q&A

5. Transparency in the financial sector 16.10 – 16.40

Walter Merricks CBE, Former Chief Ombudsman for Financial Service

- The financial services context: big banks, small independent financial adviser firms
- First tier complaints and ombudsman data
- The FCA and the Financial Ombudsman Service
- Q&A

6. Open discussion: steps towards the publication of complaints data 16.40 – 16.55

Sarah Chambers, LSCP Chair

7. Next Steps 16.55 – 17.00

Legal Services Consumer Panel

Thursday, 5 July 2018, 15:00 to 17:00,



Contextualising Complaints Data in Legal Services Roundtable

Summary

Background to the roundtable event

- In 2016, the Legal Services Consumer Panel published the Open Data report calling for improved transparency in the legal services sector. We called for improved transparency on pricing and quality information, including the publication of first-tier complaints data. We also recommended that the Legal Ombudsman (LeO) publish its Ombudsman decisions in full.
- Subsequent to the Panel's Open Data report, the Competition & Markets Authority published a comprehensive review of the legal services sector. The CMA found a market where competition was not working as well as it could because consumers lacked access to the information they need to make informed decisions.
- To remedy the deficiencies, the CMA proposed a host of transparency measures, including an exploration of how access to quality indicators could be improved. The Panel expressed a strong interest in supporting approved regulators in the delivery of the CMA's remedies and we have continued to be active in this area.
- The roundtable event on complaints data provided an extension of our support to the sector. In bringing cross-sectoral expertise together, the objective was to learn, to be challenged and explore what might be effective in the legal sector.

Keys points raised by the speakers

The presenters drew on their expertise from dealing and/or engaging with complaints data in other sectors (telecoms, financial services and health). The speakers made the following key points:

- Useful insight reports have been developed from complaints data. This has been used to raise standards across respective sectors.
- With regards to the telecoms sector, the high profile nature of the publication of complaints data has provided an incentive for senior executives to engage with the data, understand it and improve services, as well as providing useful information for consumers.

- Experience from other sectors (especially health) shows that many consumers want an apology, as opposed to money when something goes wrong.
- Other regulators have used the intelligence from complaints data to assess risks, and more importantly, used complaints data to produce insight reports to help improve standards across respective sectors.
- There are different approaches to contextualising complaints data, e.g. for each communications provider the volume of complaints is published per 100,000 subscribers.
- Generating and communicating data is a big ask. The more data, the more time, knowledge and effort is required to interpret it fairly and correctly.
- Improved transparency from the LeO, particularly their upheld decisions rate, is potentially the most useful information to consumers.

Points made during the wider group discussions

- A number of attendees agreed that there was not a one –size-fits-all approach to publishing first-tier complaints data. At the same time, approved regulators noted the importance of consistency where appropriate. If policies are changed often then it would be difficult to compare data over time.
- The impetus for publishing complaints data should not be for the sole purpose of decreasing the number of complaints, but to improve the service for consumers.
- Complaints data should be utilised by providers as a gift and tool to improve their services.
- Publication of complaints data should be consumer focused. It should be simple, and presented in a way that promotes consumer engagement.
- There is lack of research across different sectors on how consumers use complaints data.
- The Solicitors Regulation Authority (SRA) confirmed that they will:
 - publish an annual report with aggregated complaints data.
 - publish an insight and thematic report focused on highlighting risks, as well as improving standards amongst solicitors.
 - raise the visibility of the information they already publish and create direct links to the relevant data published by LeO.
 - establish a regulatory digital badge that confirms solicitors' or firms' regulatory status.
- It was noted that the data LeO published on its website could be presented better and in a clearer format.
- The Intellectual Property Regulation Board (IPReg) confirmed that it publishes information at an aggregate level, and that it has all former disciplinary information in one place. IPReg's 2017 Annual Report highlights the types of firms that generate complaints.

- ICAEW also confirmed that it is in a position to analyse complaints data for publication.
- The Legal Services Board (LSB) confirmed that “complaint” is clearly defined in its guidance to the sector as “any expression of dissatisfaction verbal or written.” LeO also uses this definition.
- The LSB also noted that it has recommended that all regulators assess how they can improve the consumer experience.

Action points

- The Legal Services Consumer Panel said it would explore the facilitation of a broader event focused on quality indicators more generally. This event is likely to draw on the varying approaches adopted by other sectors.

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List of attendees

Organisation	Attendance
LSCP	Speaker
Parliamentary and Health Services Ombudsman	Speaker
Ofcom	Speaker
Civil Aviation Authority	Speaker
The Law Society	Attendee
Solicitors Regulation Authority	Attendee
Bar Standards Board	Attendee
Council for Licensed Conveyancers	Attendee
Intellectual Property Regulation Board	Attendee
CILEx Regulation	Attendee
The Faculty Office	Attendee
CLSB	Attendee
ICAEW	Attendee
Legal Ombudsman	Attendee
Legal Services Board	Attendee
Competition and Markets Authority	Attendee
Civil Aviation Authority Consumer Panel	Attendee
LSCP	Attendee
LSCP	Attendee