
Customer Interaction and Feedback Report 01/04/17 to 31/03/2018

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1. Purpose

The purpose of this report is to provide a breakdown of complaints and non-medical Internal Dispute Resolution Procedures (IDRPs) completed, and compliments and other feedback received from 1 April 2017 to 31 March 2018 for the Scottish NHS, Teachers', Police and Firefighters' pension schemes. This report will be published in line with SPSO Complaints Handling Procedures.

2. Complaints Breakdown

A total of 92 complaints were completed between 1 April 2017 and 31 March 2018, compared to 145 in 2016/17, and these are broken down as follows:

| Scheme | Total complaints completed 2017/18 | % of total complaints | No of scheme members* | Number of complaints per 10,000 members | Outwith KPI | Total complaints completed 2016/17 |
|---------------|------------------------------------|-----------------------|-----------------------|---|-------------|------------------------------------|
| Teachers' | 32 | 35% | 172027 | 1.86 | 5 | 41 |
| NHS | 40 | 44% | 332424 | 1.20 | 1 | 48 |
| Firefighters' | 5 | 5% | 11891 | 4.20 | 0 | 7 |
| Police | 15 | 16% | 33769 | 4.44 | 0 | 49 |
| Total | 92 | 100% | 550111 | 1.67 | 6 | 145 |

* Number of active, deferred and pension members per scheme as at 31/03/17.

The target for issuing responses to complaints is 5 days from receipt for stage 1, and 20 working days for stage 2, which are in accordance with SPSO guidelines. The Agency's Key Performance Indicator (KPI) for complaints is 98%.

For the 2017/18 reporting year the Agency achieved 93.48% (84.38% for Teachers', 97.5% for NHS, and 100% for Police and Firefighters'). Four complaint responses missed the KPI for Teachers' due to: the complaint being sent to an individual's email while they were on annual leave, admin delay within the team (1), not initially being identified as a complaint (1), being incorrectly indexed (2); the NHS complaint response that missed the target was due to admin delay within the team.

3. Category of Complaint

The nature of each complaint is categorised, and the number of complaints received per category is shown in the table below:

| Scheme | Error | Other | Over-payment | Policy | Response Time | Standard of Service | Total |
|---------------|-------|-------|--------------|--------|---------------|---------------------|-------|
| Teachers' | 4 | 2 | 6 | 1 | 2 | 17 | 32 |
| NHS | 4 | 4 | 3 | 0 | 6 | 23 | 40 |
| Firefighters' | 1 | 0 | 0 | 0 | 1 | 3 | 5 |
| Police | 1 | 2 | 1 | 0 | 4 | 7 | 15 |

| | | | | | | | |
|--------|----|---|----|---|----|----|----|
| Totals | 10 | 8 | 10 | 1 | 13 | 50 | 92 |
|--------|----|---|----|---|----|----|----|

The top category across all schemes was Standard of Service. Overpayment was the 2nd biggest category of complaint for Teachers', and response time was the 2nd for NHS, and Police. Due to the low number of complaints from the Firefighters' pension scheme members, there were no recurring themes. Trends in these categories are highlighted in the table below.

| Scheme | No of complaints | Nature of complaint |
|----------------------|------------------|--|
| Standard of Service: | | |
| Teachers' | 7 | Incorrect information given: <ul style="list-style-type: none"> • Informed they qualified for a pension on several occasions, but they didn't have enough qualifying service; • Told the incorrect pensionable salary that their pension would be calculated on • Not being informed they did not qualify for a refund • MyPension Online not showing death nomination or reflecting last 3 years' service • Being given conflicting information regarding opting out for 1 day prior to 31/03/15 (joining CARE) to receive a notional calculation (same member raised stage 1 and stage 2 complaint) • Incorrect service shown on service summary and several spelling mistakes on letter |
| | 2 | Error made: <ul style="list-style-type: none"> • Incorrect NI Number on record • Service awarded at retirement differed to that showing on annual benefit statement |
| NHS | 9 | The length of timescales to process request or time taken respond to query: <ul style="list-style-type: none"> • Time taken to deal with IDRPs • Failure to respond to several queries both online and emails regarding annual benefit statement and pension benefits • Time taken to process a refund (4) and Additional Pension quote (1), transfer in (2) |
| | 3 | Quality of response to request: <ul style="list-style-type: none"> • Felt previous response to query did not fully answer all questions (2) • Member felt they had been given contradicting advise regarding opting out and the administrator was not very helpful on the phone |
| Firefighters' | 3 | <ul style="list-style-type: none"> • Phoned the SPPA on several occasions before reaching normal pension age, but took a long time to get a response to find they were in the wrong scheme • Member felt SPPA have misled him as he thought he |

| Scheme | No of complaints | Nature of complaint |
|--------|------------------|---|
| | | <p>could transfer in from the Armed Forces pension scheme on transitioning to CARE, but he could not as had continuity of service from NFPS</p> <ul style="list-style-type: none"> Member complained about the delay in the implementation of the pension sharing order |
| Police | 2 | <ul style="list-style-type: none"> No initial response to query, then the information received did not answer query Lack of response to ABS requests <p>There were no other themes in this category and complaints ranged from members having to write in to change bank details, incorrect name and NI on email correspondence, and not being able to get a refund due to transferred in service</p> |

| Response Times: | | |
|-----------------|---|--|
| Teachers' | 2 | Both delays in receiving estimates of pension benefits |
| NHS | 6 | <ul style="list-style-type: none"> Not receiving a response for queries regarding ABS/estimates (2) Length of time taken to deal with ERRBO (1) and transfer request (1) No response to query regarding "Brewster" case (nominating partner for death benefits) Delay in receiving response to request for details of pension contributions paid |
| Firefighters' | 1 | No reply to member querying the amount of pension benefits put into payment |
| Police | 4 | <ul style="list-style-type: none"> Delays in receiving an estimate (2) Delay receiving information regarding GMP Delay receiving response to query regarding transferring in, and as a result not happy about not being eligible for PPS |

| Overpayments | | |
|--------------|---|---|
| Teachers' | 6 | <ul style="list-style-type: none"> Delay in ceasing pension on death caused overpayment (2) Member informed SPPA they had become re-employed but no action was taken so the earnings limit was exceeded Incorrect tax code used Refund of contributions was calculated incorrectly and therefore overpaid |

4. Complaints Outcomes

The table below details the total number of each outcome for the complaints completed. In the case of complaints the agreed outcomes are:

- not upheld – complaint is not justified (Disagreed with member)
- partly upheld – there is some justification to the complaint (Partly agreed with member)
- upheld – complaint is justified (Agreed with member)

The SPPA's agreed outcomes for complaints are labelled differently than for IDRPs. However for the purposes of this report, and to provide clarity, the outcome for both complaints and IDRPs have been given the same labelling.

| Scheme | Stage 1 outcome | | | | Stage 2 outcome | | | |
|---------------|--------------------|---------------------------|-----------------------|----------------------|--------------------|---------------------------|-----------------------|----------------------|
| | Agreed with member | Partly agreed with member | Disagreed with member | % agreed with member | Agreed with member | Partly agreed with member | Disagreed with member | % agreed with member |
| Teachers' | 13 | 6 | 9 | 46% | 3 | 0 | 1 | 75% |
| NHS | 12 | 4 | 14 | 40% | 5 | 1 | 4 | 50% |
| Firefighters' | 2 | 0 | 2 | 50% | 0 | 0 | 1 | 0% |
| Police | 4 | 3 | 6 | 31% | 0 | 0 | 2 | 0% |
| Totals | 31 | 13 | 31 | 41% | 8 | 1 | 8 | 47% |

5. IDR P1 Breakdown

A total of 79 IDR P1s have been completed this year, compared to 80 in 2016/17. These are broken down as follows:

| Scheme | IDR P1s completed 2017/18 | % of total IDR P1s | Outwith target | Total No of scheme members* | Number of IDRPs per 10,000 members | IDR P1s completed 2016/17 |
|---------------|---------------------------|--------------------|----------------|-----------------------------|------------------------------------|---------------------------|
| Teachers' | 27 | 34% | 0 | 172027 | 1.57 | 20 |
| NHS | 40 | 51% | 2 | 332424 | 1.20 | 34 |
| Firefighters' | 4 | 5% | 0 | 11891 | 3.36 | 4 |
| Police | 8 | 10% | 0 | 33769 | 2.37 | 22 |
| Total | 79 | 100% | 2 | 550111 | 1.44 | 80 |

* Number of active, deferred and pension members per scheme as at 31/03/17.

The target for dealing with IDRPs is two months from date of receipt. The KPI for this is 100%. The Agency achieved 97.47% (100% for Teachers', Police and Firefighters, and 95% for NHS). One NHS IDR P1 missed target due to the office being shut as a result of adverse weather, and the other missed due to it not being identified in time (admin error).

6. IDR P1 Outcomes

The table below details the outcomes of the IDR P1s completed. The agreed outcomes for IDR P1s are:

- upheld – SPPA’s original decision is upheld (disagreed with member)
- overturned – SPPA’s original decision is overturned (agreed with member)

The SPPA’s agreed outcomes for complaints are labelled differently than for IDRPs. However for the purposes of this report, and to provide clarity, the outcome for both complaints and IDRPs have been given the same labelling.

| Scheme | IDRP1 outcome | | % of original decisions overturned |
|---------------|-----------------------|--------------------|------------------------------------|
| | Disagreed with member | Agreed with member | |
| Teachers’ | 23 | 4 | 15% |
| NHS | 35 | 5 | 13% |
| Firefighters’ | 3 | 1 | 25% |
| Police | 8 | 0 | 0% |
| Total | 69 | 10 | 13% |

The IDR P decisions that were overturned at stage 1 are as follows:

| Scheme | No of disputes | Nature of complaint |
|-----------|----------------|---|
| Teachers’ | 4 | <p>All were disputes regarding overpayment due to breach of earnings limit on re-employment:</p> <ul style="list-style-type: none"> • 2 x decision to recover overturned due to length of time elapsed since overpayment made (over 5 years) • Member retired on premature grounds, but the regulations regarding re-employment did not cover premature retirement prior to 1 April 2015 • Overpayment occurred due to holiday pay being paid in the wrong month, once this holiday pay was correctly recorded there was no longer an overpayment. |
| NHS | 5 | <ul style="list-style-type: none"> • Ill health retirement should have been treated as active and paid from date of leaving scheme, not date of retirement application. • Member (medical practitioner) was originally informed his employers contributions would not be refunded due to him opting out, but this decision was overturned • 2 x members informed they were not eligible for special class status, however on IDR P investigation it was found they were • Member disputed the salary used to calculate her earnings limit. The original calculation used the last 365 days, but on investigation the regulations state it should be the highest 365 days in the last 3 years. |

| | | |
|---------------|---|--|
| Firefighters' | 1 | Widow's pension ceased on cohabitation. Overturned as FPS regulations do not cover cohabitation. |
| Police | 0 | |

7. IDR P1 Trends

IDRP1s are not grouped into categories according to the error type; however the main trends identified for each scheme are as follows:

| Scheme | No of disputes | Nature of dispute |
|---------------|----------------|---|
| Teachers' | 10 | Overpayments, all of which were due to breach of earnings limit on re-employment (8 of these were identified during SPPA's National Fraud Initiative exercise) |
| | 4 | Disputing the refusal of transfers due to time limits (3 TVs in and 1 TV out). |
| NHS | 13 | Overpayments. Five of these were due to revision of pension due to final figures being received by employers and four were due to breaching earnings limit on re-employment. |
| | 8 | Disputed not having entitlement to special class (5) or MHO (3) |
| Firefighters' | 0 | No trend but varies from disputing widows pension ceasing on co-habitation, overpayment, being time-barred from purchasing additional pension and the value of service credit received from transfer in. |
| Police | 2 | Not being able to receive a refund of contributions as opted out during 23 rd month of scheme membership. In accordance with the regulations the opt out would not take effect until the first day of the pay period beginning after the opt out is completed which took them over 2 years' service. |
| | 2 | Disputing the service used to calculate ill health and injury benefit awards |

8. IDR P2 Breakdown

The table below details the total number of IDR P2s received and the outcomes. As with IDR P1s, the agreed outcomes of IDR P2s are:

- upheld – SPPA's original decision is upheld (disagreed with member)
- overturned – SPPA's original decision is overturned (agreed with member)

| Scheme | IDRP2 outcome | | % of original decisions overturned | If overturned nature of dispute |
|---------------|---------------|-----------|------------------------------------|--|
| | Upheld | Overtured | | |
| Teachers' | 8 | 4 | 33% | <ul style="list-style-type: none"> • Overpayment due to breach of earnings limit. Premature Retirement not covered in regulations prior to 1 April 2015. • Member questioned if beneficial to Opt Out to preserve higher salary. It was determined Financial Advice was provided incorrectly by SPPA. • Overpayment identified due to breach of earnings limit following re-employment. The member had not stopped working so should not have received her pension, or be subject to an earnings limit. • Administration error – Past Added Years not calculated correctly as per the Regulations. |
| NHS | 11 | 1 | 8% | <ul style="list-style-type: none"> • Member was refused transfers in from the Teacher's Pension scheme and a personal pension, as the request was not made within the 12 months of first joining the scheme. It was determined at IDRP2 that the transfer was requested within 12 months of joining the CARE scheme so should be allowed. |
| Firefighters' | 0 | 0 | 0% | |

| | IDRP2 outcome | | % of original decisions overturned | If overturned nature of dispute |
|--------|---------------|-----------|------------------------------------|--|
| | Upheld | Overtured | | |
| Police | 5 | 3 | 38% | <ul style="list-style-type: none"> • Police Survivor benefits re-instated following the Government's decision on re-marriage & co-habiting. • Child allowance ceased following evidence of earning relating to Vocational Training. SPPA determined it unreasonable to pursue recovery of overpayment as it could have been identified |

| | | | | |
|-------|----|---|-----|--|
| | | | | <p>earlier.</p> <ul style="list-style-type: none"> Earmarking Order – original decision was that as the ex-spouse was not a member of the scheme, SPPA could not hold data on them. At IDR2 it was determined that with their consent we could hold sufficient information to enable contact with her around time of her ex-husbands retirement. SPPA should also reconsider whether the different levels of charge now attached to the Ear Marking Order is appropriate. |
| Total | 24 | 8 | 25% | |

9. Pensions Ombudsman Cases

| Scheme | Pensions Ombudsman outcome | |
|---------------|----------------------------|-----------|
| | Upheld | Overtured |
| Teachers' | 3 | 0 |
| NHS | 3 | 0 |
| Firefighters' | 0 | 0 |
| Police | 2 | 0 |
| Total | 8 | 0 |

10. Lessons Learned

Following the resolution of complaints and IDRPs lessons learned may be identified. When they are identified, templates are issued to the relevant Operations Manager for action to be taken to prevent further occurrences. The Operations Manager returns the templates to Stakeholder Liaison outlining what action has been taken. Once these have been returned, it is the responsibility of the Operational teams to ensure that all actions are fully implemented. The table below shows the number of lessons learned initiated for 2017/18.

| Scheme | Complaints | IDRP1 | IDRP2 | Total |
|---------------|------------|-------|-------|-------|
| Teachers' | 0 | 5 | 7 | 12 |
| NHS | 2 | 2 | 0 | 4 |
| Firefighters' | 0 | 1 | 0 | 1 |
| Police | 0 | 2 | 0 | 2 |
| Total | 2 | 10 | 7 | 19 |

Actions taken following lessons learned include:

- Updating information on SPPA's website and the scheme guides on opting out of the Police pension schemes to provide clearer guidance.
- Reminders to staff of the importance of updating records with phone logs and file notes, and calling members back when requested
- Reminders to staff that the correct tasks are created, put in the right work trays which should be regularly checked to avoid delays in issuing responses.
- Requesting a change in procedures to notify members who have received an estimate within 12 months of retiring and the figures have changed considerably, to give them an opportunity to change their retirement plans where possible.

11. Compliments Received

Details of compliments received from customers, either by letter/card, email or telephone, are forwarded to Stakeholder Liason team. These are logged and then passed to the Head of Customer Services and Chief Executive, who contacts the relevant member/s of staff to offer their thanks for the customer care they have provided.

| Scheme | Received 2017/18 | Received 2016/17 |
|---------------|------------------|------------------|
| Teachers' | 10 | 8 |
| NHS | 18 | 13 |
| Firefighters' | 0 | 0 |
| Police | 2 | 15 |
| Total | 29 | 36 |

12. Customer Survey Actions

SPPA implemented a continuous member survey on the home page of the website in August 2016. A link to the survey is included in the footer of outgoing emails to encourage members to take part. The data used for the preparation of this report is from 1 April 2017 to 31 March 2018.

Participation

The number of people participating in the survey is broken down into member type as follows:

| Scheme | No participated | Existing Member | Pensioner | Thinking of Joining | Left the Scheme |
|---------------|-----------------|-----------------|-----------|---------------------|-----------------|
| Teachers' | 819 | 395 | 364 | 3 | 42 |
| NHS | 1520 | 1007 | 423 | 8 | 51 |
| Firefighters' | 60 | 42 | 14 | 0 | 1 |
| Police | 244 | 137 | 86 | 2 | 11 |
| Total | 2643 | 1581 | 887 | 13 | 105 |

The most engaged member types are existing member and pensioner.

Some questions within the survey are optional, and therefore not all questions have been answered in all cases.

Reason for contacting the Agency

Question 6 of the survey asks “What was the main reason for contacting the SPPA?” and the responses per scheme are listed in the table below:

| Scheme | Total | Upcoming retirement | Opting Out | Tax Query | Benefit Statement | Transferring in/Out of the scheme | Change of Details | Other |
|---------------|-------|---------------------|------------|-----------|-------------------|-----------------------------------|-------------------|-------|
| Teachers’ | 419 | 171 | 10 | 12 | 117 | 8 | 23 | 78 |
| NHS | 695 | 277 | 10 | 34 | 177 | 21 | 52 | 124 |
| Firefighters’ | 47 | 17 | 2 | 5 | 8 | 1 | 4 | 10 |
| Police | 184 | 46 | 3 | 7 | 45 | 2 | 17 | 64 |
| Total | 1345 | 511 | 25 | 58 | 347 | 32 | 96 | 276 |

The three most common themes emerging from the responses were upcoming retirement, benefit statements and other. Other includes change of marital status, scheme information, online services, incorrect information, additional pension/contributions information, and chase up due to non-response. Whilst not everyone answered this question, some respondents selected more than one option.

Customer Satisfaction

Customer satisfaction is measured in Question 10, which asks “Please indicate how satisfied are you with the SPPA overall?”. The total number of all participants who answered was 2281, and the results are categorised below:

| Scheme | Completed Q10 | Extremely Satisfied | Quite Satisfied | Not very Satisfied | Extremely Dissatisfied |
|---------------|---------------|---------------------|-----------------|--------------------|------------------------|
| Teachers’ | 730 | 359 | 203 | 99 | 69 |
| NHS | 1316 | 565 | 511 | 166 | 74 |
| Firefighters’ | 42 | 7 | 13 | 14 | 8 |
| Police | 193 | 82 | 44 | 37 | 30 |
| Total | 2281 | 1013 | 771 | 316 | 181 |

Staff have been notified where their full name has been provided or they can be easily identified in positive comments.

All feedback received from the continuous survey has been reviewed and a tracker has been created which details the feedback received and the recommended actions. The majority of actions identified for this year is work that is already being undertaken. Each action has been allocated to the appropriate senior manager to be taken forward and updates are provided. Feedback has been assessed on a monthly basis, and actions are added to the tracker as required, which has been monitored as the year progressed.

Below is a table showing the actions created following feedback from the continuous survey that have been completed for the period covered by this report:

| Category | Feedback | Action Completed |
|---------------------------|---|---|
| Benefit Statements / Data | More explanation of terms | Frequently Asked Questions (FAQs) updated on the SPPA's website |
| | Timescales involved in the ABS exercise and the reasons behind these decisions <ul style="list-style-type: none"> • Issue date of Annual Benefit Statements (ABS) • Accuracy of member data | <ul style="list-style-type: none"> • SPPA undertook an Annual Return campaign to assist employers and highlight timescales and obligations involved in this process. • A Readiness Document was posted on website for employers along with a checklist for employers, EDM Online Guide and a circular for Employers. • Staff have been reminded to check members' details are correct when correspondence is received. |
| | Members not receiving an Annual Benefit Statement on time | SPPA clarified the timescales / process involved in producing the ABS within the FAQ's published on the website |
| My Pension | Ease of use / usability / Digital Platforms | An upgrade has now been delivered to SPPA's online services. |
| Website | SPPA Website not able to support different Digital Platforms / Mobile Ready | An upgrade has now been delivered to SPPA's online services. |

We are also comparing trends in results with the complaints and IDRPCs to identify any areas of concern raised within the free text answers, but there has not been any identified for this reporting period.