

Trading Standards Review of CitA Consumer Service Cases

Feedback Report

September 2017

Overview

Trading Standards and the Citizens Advice (CitA) consumer service have an initiative in place that annually provides a mechanism for TS to evaluate the quality of cases they receive, and report these findings back to a central point for national collation. These findings are then analysed and the results shared in the form of a joint report that outlines the key themes and issues identified from the review and the activities that will be undertaken by CitA as a result.

Background

The Citizens Advice consumer service measures performance through a number of targets and has provided the results of these to TS partners each month (although this has been paused during the transition). This includes measuring the quality of cases, and uses a framework that uses call recordings and case information to assess the following areas:

- Questioning - ensuring sufficient information has been collected from the client to allow for complete advice to be offered, identification of potential referrals and any required supporting information
- Advice - accurate legal advice provided, with clear practical steps to follow for the client to resolve their issue, additional advice offered on other redress routes or alternative actions that may be taken and clear expectation management
- Customer service - appropriate pitch, pace and tone, good structure of call or email response, impartiality and adherence to agreed processes
- Data quality and referrals – accurate recording and coding of case on systems, including representative case notes and appropriate referrals attached

This framework provides a robust examination of the quality of contacts into the consumer service.

The service also has a feedback process to allow partners to inform the operations team of referrals and notifications that require attention. Reasons for this might include incorrect advice, misdirected referrals or the quality of data provided. These cases are passed back to the contact centres for immediate action with advisers, and also trends are analysed to feed into development plans for individuals and teams. The service sets a target of less than two per cent of referrals leading to feedback from partners, and this has been consistently achieved (although, as anticipated by CitA, this did increase during transition to nearer 3%).

In addition to these measures however, Trading Standards felt that it would be useful to undertake a more general overview of quality from their perspective, via an exercise to assess cases on the basis of the information received (i.e. case notes for referrals and notifications). The methodology has been discussed and approved each year, through the regularly convened Trading Standards working group, which is attended by Trading Standards representatives from each region/nation, the department of Business, Energy and Industrial Strategy (BEIS) and the Consumer Service operations team. This assessment exercise was first undertaken in 2012, and has taken place on a regular basis subsequently.

Trading Standards authorities are invited once a year, for a defined period of between a day and a week (depending on resource availability) to assess every case that is passed to them by the consumer service, either by notification or referral. Each case is provided a status of red, amber, or green by contributing authorities as follows, and these definitions are shared prior to the commencement of the audit:

- Green – no issues. A good example of a case from the consumer service.
- Amber – minor issues. Overall acceptable standard but some areas of improvement.
- Red – serious issues. Significant problems with the advice or case information.

As call recordings are not available to authorities when assessing quality, only case notes, coding and other information are used when categorising each referral or notification.

It is important to note that the consumer service's quality framework does not require a score of 100% to pass an individual review. It is recognised that some minor issues on a case may be identified but the overall standard of the case may be deemed acceptable. The service currently requires a pass mark of 85% on each case and the overall KPI for the service is that 70% or more of these cases achieve the pass mark.

In this context therefore, green and amber coded case from TS are likely to be deemed as having met or exceeded the required quality standards for the consumer service, while red cases would not.

The regional information is collated using an excel spreadsheet, originally drawn up by Yorkshire and the Humber Trading Standards Group (YAHTSG) and amended by Trading Standards East Midlands (TSEM) to make category coding and case type clearer.

For the 2017 review, individual local authorities were asked to assess data received on dates during w/c 18th September 2017. Each region provided a summary of the returns from their local authorities which was then collated and analysed by TSEM, before being passed to the consumer service operations team for any additional input and action by the contact centres.

The overall statistical findings of this exercise were reported to the Trading Standards Working Group meeting on 17th October 2017, but following publication of this report the consumer service will confirm their approach to the outcomes of this exercise.

Initial Findings

This year data was received from 124 Local Authorities across all English regions, Wales and Scotland, which equates to 65% of LAs participating in the audit. A total of 3132 cases were reviewed. This is a major increase in participating authorities (nearly double the number that took part in 2016) but with fewer cases reviewed (down from 3694 in 2016).

The increase in participating authorities could be due to all authorities being encouraged to take part with the understanding that this year's audit would be even more invaluable, following the consumer service transition from the previous supplier to new delivery centres within the Citizens Advice network in England and Wales earlier this year, in continuing the development of the new advisors and to ensure quality is embedded in the new centres.

The reduction in the number of cases reviewed from previous years' audits, despite the increase in the number of authorities taking part, could be due to the overall reduction in consumer service call volumes and therefore referral and notification levels to local authorities. The consumer service transition has had some impact on call volumes, although the numbers were in decline before this. The reduction in the number of cases reviewed could also be due, in part, to LAs only having the resources to dedicate to reviewing one day of cases, as opposed to previous years where some have had the capacity to review several days' worth, or no longer being limited to reviewing at least 50 cases each (as a minimum), but instead asked only to review at least one full day's worth of referrals and notifications (which can be considerably less than 50 per authority).

This year, we attempted to capture why some LAs were unable to take part (due to reductions in participation that had been seen over the previous few years). 25% of the 68 LAs that didn't undertake the review attributed it to lack of capacity. Only 1 LA didn't receive enough notice before the deadline to enable them to take part. However 74% of those LAs that didn't take part also didn't complete a 'nil return' reason so the true picture of reasons for non-participation cannot be accurately reflected.

The following table summarises the raw data by region, in comparison to the 2016 review results:

Region	Green				Amber				Red			
	2017		2016		2017		2016		2017		2016	
	No.	%	No	%	No.	%	No	%	No	%	No	%
CEnTSA	214	71%	93	57%	52	17%	53	32%	37	12%	18	11%
EETSA	246	68%	164	72%	82	23%	44	19%	33	9%	21	9%
LTS	132	65%	187	58%	48	24%	81	25%	23	11%	57	17%
NETSA	146	66%	85	65%	59	27%	34	26%	15	7%	11	9%
SCOTSS	97	62%	137	63%	35	22%	50	23%	25	16%	30	14%
SWERCOT S	308	68%	129	71%	90	20%	32	18%	58	13%	20	11%
TSEM	170	75%	177	73%	37	17%	44	18%	19	8%	22	9%
TSNW	234	56%	363	71%	93	22%	76	15%	89	21%	73	14%
TSSE	256	77%	171	67%	52	15%	46	18%	28	8%	37	15%
WWhoTS	49	59%	475	69%	20	24%	98	14%	14	17%	11	17%
YAHTSG	239	64%	319	57%	76	21%	116	20%	56	15%	12	23%
Total No / Average %	2091	67%	2300	66%	644	20%	674	19%	397	13%	533	15%

The overall percentages of cases determined to be green, amber and red nationally remains fairly consistent with previous years, with no significant changes in the case categorisation for 'good' green cases coding (up to 67% from 66% in 2016) or 'serious issues' red cases coding (down to 13% from 15% 2016). Approximately one third (33%) of cases were deemed to have had an issue of some kind, whether minor or major (red and amber coded cases combined).

Despite providing examples of what types of advice issues would fall into the different red and amber categories to aid consistency, there still remain major variations in case coding and the perceived quality of case notes between the regions, with less than one in ten of cases coded as red, with serious advice issues, in East of England, North East, East Midlands, and the South East, to one in five cases coded as red in the North West.

CEnTSA and TSSE recorded the most significant improvement to case categorisation, with an increase of 14% and 10% respectively in their green ratings. TSNW recorded the highest increase in red ratings (up 7% on the previous year).

The full regional analysis can be found in Appendix 1.

Issues Identified

As noted above, 13%, or 397 out of a total of the 3132 cases, were reviewed and categorised as red. The results from each region's 'serious issues' were summarised into several broad categories. There is some potential overlap between the categories and some cases were identified as having multiple

shortcomings. However, for this report they have only been categorised once, using the main issue.

The following summary highlights the key problem areas:

Overview of Cases Coded Red Results	%	
	2017	2016
Incorrect/Poor Advice	21%	37%
Protocol not followed	6%	3%
Incorrect Referral/Notification/Signpost	16%	17%
Incomplete details (trader, consumer, key dates, payment, etc.)	28%	31%
Incomplete advice/Situation unclear	16%	9%
Offences not picked up and not referred	13%	3%

When comparing the 2017 results with the previous survey, there appears to have been a decrease in the levels of incorrect/poor advice and cases with incomplete details. However, issues with protocol not followed, incomplete advice/situation unclear and offences not picked up and not referred have all seen fairly significant increases.

In addition, each region had the opportunity to add any additional comments they wanted to and what they felt were the main issues in their regional return. Whilst there were many examples where good advice has been given, the most common points raised were lack of detail regarding complaints and the advice given, incomplete or confusing advice and in some instances no real or relevant advice given. For Trading Standards to understand and act on referrals, it is essential that the notes are clear and contain all information about the problem and the advice given. With regard to missed offences, many of these related to either CPRs or ICACS (Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013). The remaining points made by regions related to advisers not identifying business to business complaints, not gathering sufficient details of products or purchases and issues with referrals sent to the wrong local authority, or referrals sent as notifications and vice versa (which may not be fed back by TS via normal routes to the Citizens Advice Operations Team in those authorities that don't always look at or import all their notifications).

Since 2014, there has been an additional column in the review spreadsheet to capture the 'case type' of each referral and notification so that the data can be analysed for any trends in areas of TS work that Advisors may have particular issues with and to identify areas of training needs for CitA Advisors.

The table below shows the split of 'case type' and how many of each was coded as red, amber or green. 84% of the cases that were reviewed had a complete 'case type' category. It should be noted that a number of authorities (17 in total) either didn't complete this field (10 LAs), entered their own categories (7 LAs) which couldn't be matched across to the options that were available in the fixed drop down list or only partially recorded the case type for some of the cases they reviewed (4 LAs). Therefore the table below does not reflect a complete national picture.

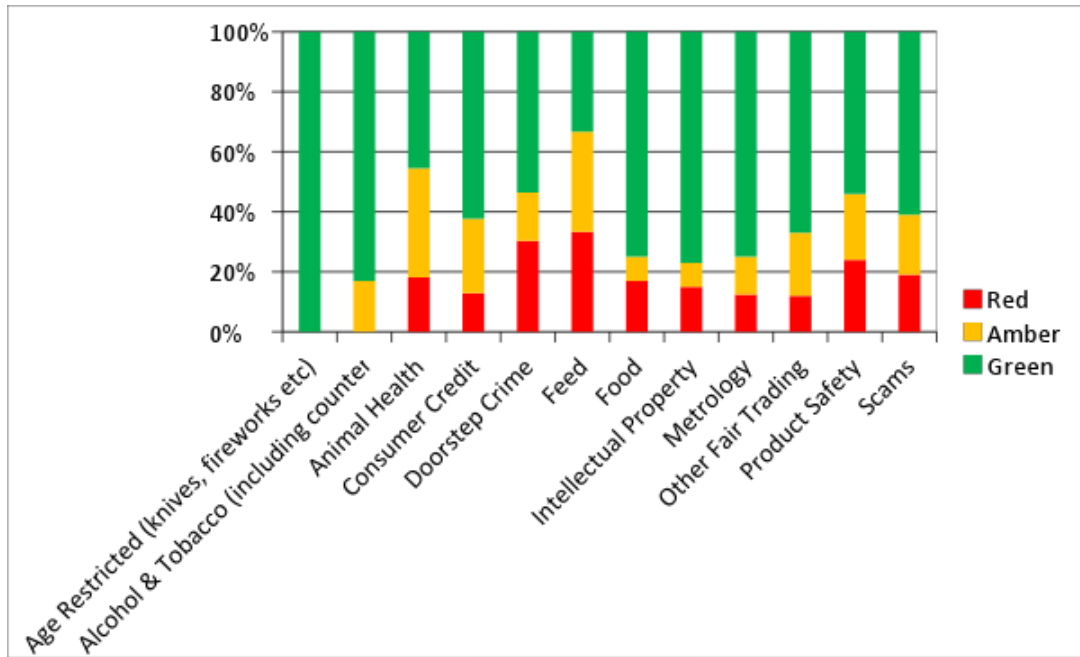
To place the below data in its full context, it should also be noted that the vast majority of cases (89%, 2358 of the 2643 reviewed and categorised) were coded as 'other fair trading'.

As such it is difficult to make comparisons and draw conclusions from the table below. In some categories there were only a handful of cases across the entire audit and therefore the percentages can appear slightly misleading. However, to add some context, after excluding 'other fair trading', the case type categories that had the most cases were scams, product safety and doorstep crime – priority areas for the majority of TS services.

Details of Contacts by Case Type

	Total cases	Red		Amber		Green	
		Cases	%	Cases	%	Cases	%
Age Restricted (knives, fireworks etc)	5	0	0%	0	0%	5	100%
Alcohol & Tobacco (including counterfeit and illicit)	6	0	0%	1	17%	5	83%
Animal Health	11	2	18%	4	36%	5	45%
Consumer Credit	8	1	13%	2	25%	5	63%
Doorstep Crime	43	13	30%	7	16%	23	53%
Feed	3	1	33%	1	33%	1	33%
Food	24	4	17%	2	8%	18	75%
Intellectual Property	13	2	15%	1	8%	10	77%
Metrology	8	1	12.5%	1	12.5%	6	75%
Other Fair Trading	2358	294	12%	487	21%	1577	67%
Product Safety	80	19	24%	18	22%	43	54%
Scams	79	15	19%	16	20%	48	61%

National CitA Contacts by Case Type and RAG status



From this analysis, the three advice areas with the most significant advice issues (coded red) seem to be:

- Doorstep Crime, with 30% of cases coded as red (of 43 cases)
- Product Safety, with 24% of cases coded as red (of 80 cases)
- Scams, with 19% of cases coded as red (of 79 cases)

There were also a number of 'case types' where a significant number of reviewed cases had an issue (the combined total of red and amber categories):

- 66% of Feed (2 out of 3 cases)
- 54% of Animal Health (6 of 11 cases)
- 46% of Doorstep Crime (20 of 43 cases)
- 46% of Product Safety (37 of 80 cases)

In comparison to the results of the 2016 review, there has been a decrease in the quality of advice in doorstep crime cases (an increase from 9% rated red in 2016 to 30% rated red in 2017).

A full breakdown of 'case type' categorisation by region (where available) can be seen in Appendix 2.

Conclusions

Both TS and CitA can be re-assured by the overall results of the review, as they show that following the consumer helpline's transition earlier in the year and recruitment and training of new Advisors, the quality of case notes has remained consistent with previous years.

The noticeable drop in the total cases that were reviewed, despite the significant increase in the number of participating authorities, is likely to be a reflection of the decline in call volumes and correspondingly in complaint numbers and intelligence for TS. Whilst not something that can be addressed by CitA's quality framework, it is an issue that TS are concerned about and has been raised previously, with ongoing discussions about ways to address this.

The more general spread of reasons for cases being coded as red may be as a result of the transition and reasonably new Advisors who have less experience. To improve this, there may be benefit in certain areas of focus and refresher training for Advisors in the areas identified, as has happened in previous years, to lead to improvements.

As in previous years, the review highlights the need for training in priority areas for TS, e.g doorstep crime, product safety and scams.

Consumer service development activities

Citizens Advice and Citizens Advice Scotland are again grateful to all of the authorities that took part in this exercise, and are particularly pleased to see the number of those participating increased so significantly.

In previous years, the output from this audit has been invaluable in driving performance improvements and helping identify areas for development that are of particular priority to our centres. Following the transition of the service in England and Wales to new delivery centres from within the Citizens Advice network, and the number of relatively inexperienced advisers as a result, it is even more important tool to assist with their development at individual, centre and service-wide level.

Our approach to the transition was to ensure quality, and partner and client satisfaction were made absolute priorities. To that end, we are pleased to see that overall results have remained broadly consistent with previous years, as this correlates with data from other sources that this objective has been met successfully to a significant degree. Referrals were another area we worked with the new centres on in particular, and while the audit highlights some issues, we are pleased that the level of cases being referred to partners as a proportion of the total volumes being answered has increased following the transition of the service.

Nonetheless there are a number of development areas for us to focus on in order to ensure we maximise the value of the data that has been collected.

All delivery centres have already been issued with the detailed case-by-case breakdown to allow them to work with individual advisers. Feedback will be offered on those cases that were red or amber, and where appropriate this may trigger additional support, coaching or training activity.

Following a review of the audit data in conjunction with quality activities, we have already implemented additional case checking, over and above that within our existing quality process, for doorstep cases. This will be expanded to include scams and product safety in early 2018.

From existing partner feedback we had identified some issues with protocol adherence by advisers, particularly those that are less experienced. While overall quality results have been broadly very positive, we had noted that following some processes was an area for development. As such a protocol guide was created for all advisers that highlighted the most effective ways to use protocols to avoid incorrect or missed referrals. This was to help with both common case types and those that are much rarer as a proportion of their work, such as feed or animal health. A series of resources for advisers to refer to around these case types will also be developed. Increased focus on civil and business referrals also formed part of this guide, and these areas are now highlighted more fully in our ongoing referral project with delivery centres.

Ensuring notes are clear and key elements have not been missed, is an area we are currently preparing a project on and this will be commenced early next

year. This project will identify good practice and facilitate the sharing of this along with the creation of quick reference resources. It will also focus on ensuring notes are clear on any information that the client did not have available or could not provide.

In terms of the subject areas, in addition to the case checking mentioned above, we will also seek to drive development of further resources for advisers through our internal training user group. This group is comprised of learning and development leads at each delivery centre, who work collaboratively on all areas of training and adviser knowledge. We will also seek to engage with appropriate local authorities for the three key subject areas (doorstep, product safety and scams) and see if they are able to feed into this group to support the work we conduct here. With doorstep in particular this was successful in the past, where the relevant lead authority provided excellent training and support for our advisers.

We will also revisit the work we have done to successfully drive referrals, to ensure advisers are able to use questioning skills appropriately to identify triggers. In conjunction with the training user group, we will also refresh the materials and resources we use for induction training in this area for new advisers.

The variation in scoring by region remains an area that we are keen to examine, through existing forums such as the Trading Standards working group. We will aim to understand why there are real or perceived differences in the results and engage with those regions in particular.

Area	Activity	Due date
Feedback type	Provide all audit data to contact centres, to allow analysis and feedback for red and amber' cases	30/10/2017
Case handling issues	Issue protocol guide to all advisers	30/10/2017
	Refresh training resources relating to referral identification and questioning skills	31/1/2018
	Commence case notes mini-project	15/01/2018
Subject matter issues	Implement case checks in areas of doorstep, safety and scams	01/12/2017
	Provide advisers with additional reference materials via the training user group	15/12/2017
	Engage with Trading Standards (initially via working group) for support in additional adviser training in main areas for development	31/01/2018
Regional variations in results	Lead discussion at next Trading Standards working group around increasing consistency	31/01/2018

	Provide greater comparison data between current quality process and audit scoring scheme on partner pages	31/01/2018
--	---	------------

Next steps

Members of the Trading Standards working group will consider these findings and CitA's planned and implemented improvement activities at the next meeting on 23rd January 2017. The group may want to undertake further analysis of the data from this exercise; and a copy of the raw data will also be provided.

Alongside information for the consumer service to act on, this exercise also highlights the importance of Trading Standards providing ongoing and regular feedback to CitA on the referrals they receive. Feedback levels of referred cases from the consumer service remain consistently under 2%, which is not fully supported by the results of this audit. If Trading Standards do not take action to feedback on individual cases at the time they occur, and raise concerns with the advice or case recording, then cases and issues requiring attention cannot be addressed successfully with individual advisers and improvements made to the service as a whole.

Data collated and report produced by TSEM, in conjunction with Citizens Advice, October 2017.