

## OVERARCHING FRAMEWORK

First I think it would be helpful if there was some overarching reference from PRP to any applicants that you expect evidence-based practice to be the norm. Features of such practice include:

1. Statement of outcomes in line with Charter Criteria (e.g. complaints - timely, courteous, speedily dealt with, fair etc.) In essence this is your Column 1 as these Criteria are largely expressed in Outcome terms.
2. Clear justification for the procedures to be put in place to deliver 1 above (e.g. good practice already evidenced by publisher, good practice evidenced elsewhere, clear hypothesis testing)
3. Establishment of quantitative and qualitative performance standards and indicators to assess effectiveness. These should be cross referenced to the outcomes in 1 so that the whole thing hangs together and makes it easy for the regulator to assess impact. However, anything which figures in column 2 in your document MUST have relevant evidence listed in column 3 otherwise there is no point in having it in column 2. It may be useful therefore as a check to go through column 2 and cross reference to column 3. In 10 for instance, column 2 has something on the need to publicise the complaints procedure but nothing in column 3 as to what evidence should be produced to assess the effectiveness of this. So it would be that the performance standards go in your column 2 with the method of collection and evaluation of evidence as column 3. These performance standards should specify:
  - Column2 - what quantitative standards are expected (these should be specific as in the complaints procedure, “maximum of X working days to respond”, “X working days to resolve stage X” , “percentage escalated” etc.
  - Column 2 - what qualitative standards e.g. X percentage drop in number of complaints after one year, X percentage of complaints resolved at Stage 1 , complainant satisfaction measures (this would include e.g.. X% felt system easily accessible, X% felt they were treated fairly, X% felt dealt with in timely manner etc.)
  - Column 3 - what data should be collected to allow them to assess themselves against 3 above (e.g. numbers and type of complaints, timescales of resolution at various stages, complainant feedback ( how is this to be collected – online, telephone, webform etc. )
  - mechanisms for review and revision against 1 and 2 above. there should be some reference within the regulator’s bid which inserts a mechanism to review and revise procedures in the light of performance against these indicators. Where a publisher seeks to improve the procedure and can **evidence** that this is in the light of current performance (rather than either change for changes sake or a perverse action to make the procedures less effective) then this should be seen by PRP when reviewing regulators, as a positive in their favour.

4. To whom this information will be reported internally and on what frequency

## QUALITATIVE PERFORMANCE MEASURES

As I said yesterday I think there needs to be some thought given to measuring the qualitative nature of the activities as well as quantitative. Clearly some qualitative information can be inferred from quantitative measures e.g. speed of resolution, lack of escalation, trend of complaint numbers

(although if a complaints system has credibility it can increase complaints numbers initially as people feel it is worth complaining and conversely people may feel there is no point in complaining to an unsympathetic and sham system.) It is important that the regulator /publisher is clear which data supports both quantitative and qualitative standards and how qualitative performance is to be inferred from such data.

However, the main way to gather qualitative information is by asking those who have been through the system about their experience. There are plenty of good examples of both private and public sector organisations doing this so it is not anything new or particularly innovative and lots of feedback forms, questionnaires are freely available to customise so any argument that this is onerous is nonsense. All effective organisations seek feedback from customers/users and almost every experience we have as consumers is followed up by one of these feedback thingies. The way the feedback is structured allows for analysis and inference but also allows for bias/unreasonableness on the part of the respondent to be taken into account.

Similarly for the whistleblowing procedure there should be some feedback sought from wbs as to their experience of the process, confidentiality, listened to, no post wb victimisation etc..

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