

**BENCHMARKING APPROACHES TO QUALITY
ASSURANCE IN THE UK OMBUDSMAN
SECTOR**

A Report for the Legal Ombudsman

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1 February 2024

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Executive summary

This report describes, and provides a comparative analysis of, the approaches to quality assurance of 11 UK ombudsman schemes (schemes). The aim of the report is to inform the Legal Ombudsman's review of its quality assurance framework. The report analyses approaches to quality assurance across the following dimensions:

- Purpose and focus of quality assurance
- Scope of quality assurance
- Risk, proportionality, and flexibility
- Sampling methodologies
- Quality assurance criteria
- Resourcing quality assurance
- Feedback and reporting

The benchmarking exercise involved analysing each scheme's quality assurance documentation and conducting a one hour interview with a person involved in managing or delivering the scheme's quality assurance framework. A summary of each scheme's quality assurance arrangements was produced and sent to the scheme to be checked for accuracy. Annex II to this report contains these summaries.

Across each of the above dimensions there are both areas of commonality and areas of divergence between schemes. There are significant differences between schemes in the sample in terms of their roles, the complaints they deal with, their size, processes, structures, and their oversight and governance arrangements. Each scheme's quality assurance arrangements are tailored to the organisation's particular needs and their particular context, at the same time as operating within a broadly comparable framework in which quality is widely recognised as an important priority for schemes.

There is broad agreement, for example, that the **purpose** of quality assurance relates mainly to the provision of assurance (either internal or external) and organisational learning. However, there are differences in the extent to which schemes consider individual performance as a focus of quality assurance. There are also differences in relation to how schemes perceive the values underpinning their frameworks and the extent to which quality control and quality assurance measures are clearly distinguished (and, where they are, the degree to which quality control measures are specified within quality frameworks).

In relation to the **scope** of quality assurance, most schemes quality assure their end-to-end casework process, although for some this is a relatively recent development. Most schemes include some measures to ensure that their quality assurance mechanisms are **proportionate and responsive to risk**. Common approaches here include varying the intensity of checks based on individual competence and managerial concerns; using priority areas/ critical areas to focus quality assurance on key issues; and using thematic quality assurance audits to be responsive to current organisational priorities. Despite all schemes wishing to ensure a proportionate approach, there is significant variation in the extent and sophistication of quality assurance frameworks between schemes.

Sampling methodologies show significant variation in terms of details. The rationale for drawing particular types and sizes of sample is not always very clear, but tends to be based on either practical experience of "what works" or a desire to achieve statistically representative samples. Sampling usually involves an element of randomness, but often this is combined with criteria-based sampling (e.g. sampling all individuals within an organisation).

Quality assurance criteria vary between schemes, although most use both broad criteria and detailed checklists to assess the casework process, service, and outcomes. Some schemes focus their quality assurance arrangements either predominantly or entirely on process and service, although it is more common for schemes to look at all of these aspects. Criteria used by schemes (while broadly comparable) show significant diversity, reflecting differences in organisational priorities, terminology, and complaint handling processes.

Resourcing of quality assurance conforms to two broad models within the sample: employing either specialist quality assurance staff responsible for quality checks or having checks conducted by operational staff. There was debate among schemes in the sample with regard to whether impartial quality staff or expert operational staff are better placed to quality assure casework. Some schemes adopt a bifurcated approach where process and service are checked by specialist quality assurance staff while outcomes are checked by those with technical and operational expertise.

Most schemes ensure that **feedback** is provided to individuals whose cases have been checked, as well as providing generalised feedback on key themes arising from quality assurance exercises. Exact **reporting** arrangements vary between schemes, although most report internally to various groups and committees, to Boards (where they exist), and to external stakeholders.

In drawing lessons from the report's analysis for the Legal Ombudsman, the following points are important to note:

- This project has not carried out an evaluation of the effectiveness of different approaches to quality assurance within the sample.
- Even if it had, the context-specific nature of many practices and approaches suggest that what might work for one organisation may not work for another.
- This report's principal value lies in providing the Legal Ombudsman with comparative perspectives and inspiration with regard to the options implemented by other schemes.

As a result, this report does not identify a set of "best practices" or a particular model for assessing the quality of casework that can be applied more broadly. Instead, in the report's concluding section, a set of "benchmarking insights" are provided which seek to summarise key issues arising from the benchmarking exercise. These are coupled with a set of "critical questions", which are designed to provide an aid for the Legal Ombudsman's review of its quality assurance framework.

The report provides 51 critical questions across each of the dimensions noted above and these form the practical output of this project (see Annex 1 for a summary). The critical questions may also prove valuable for other schemes interested in assessing or reviewing their current quality assurance arrangements. That the report provides questions for reflection rather than answers for implementation is indicative of the fact that multiple, reasonable approaches can be taken to quality in the ombudsman context. What approach is taken may depend, among other things, on organisational size, degree of staff turnover, stability or change in organisational remit, increases or decreases in complaint volumes, availability of resources, and stakeholder context and expectations. There is no one-size-fits-all solution.

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1. Introduction

This project has been commissioned by the Legal Ombudsman (LeO) in order to explore approaches to quality frameworks across UK ombudsman schemes (schemes).

LeO is interested in understanding the models and frameworks that schemes are operating to assess, assure and improve the quality of their services at various stages of their complaint handling process. This includes understanding the nature, volume, approach to sampling and frequency of quality reviews undertaken and how this is resourced within schemes.

LeO would like to know more about the matrix used by schemes to assess and benchmark quality, and how the results are reported more widely to drive improvements both within individual cases but also to deliver long term improvements across the wider organisation.

This includes understanding the impact quality assurance processes have on wider performance and how this is measured, both with regards to the quality of customer service, service complaints and satisfaction and wider operational processes and efficiencies in the complaint handling process.

Finally, LeO has asked for recommendations regarding how its current quality framework could be improved.

2. Aims, questions, and methods

2.1 Project aims

The **aims** of this benchmarking project are to:

- Understand different approaches to quality assurance and delivery across UK ombudsman schemes;
- Benchmark LeO's quality assurance framework and its results and outcomes against those of other ombudsman schemes; *and*
- Generate an evidence base to inform improvements to LeO's Quality Framework

2.2 Project questions

The **questions** this benchmarking project seeks to address are:

- What methods and approaches do schemes have to assuring quality and driving improvements in their complaint handling, both during and after the investigation process?
- How do schemes resource their quality assurance processes? Who is responsible for conducting quality checks, assessing performance and reporting on quality?
- What controls are in place to ensure consistency in the application and wider success of the framework?

- What are the key metrics used to assess and report quality by schemes and how do these compare to the LeO?
- How are frameworks designed to balance driving improvements in quality with meeting wider customer and stakeholder demands across the scheme, particularly with regards to:
 - Financial costs / resources
 - Service user satisfaction / feedback
 - Customer journey time
 - Performance management, training and support
 - Risk and proportionality, in particular any outcomes and value derived from adopting risk based models and principles.
- What are schemes' approaches to capturing customer feedback and satisfaction?
- What do schemes consider to be the key factors of success and weaknesses across their quality assurance provision(s).
- How could LeO's current Quality Framework be improved?

2.3 Project methods

The **methods** employed to deliver the project's aims and questions involved:

- Inviting 11 UK-based ombudsman schemes (including ADR schemes) to participate in the research. Schemes were selected on the basis of their size, comparability to LeO, and likelihood of offering insights into good practice in relation to quality assurance.
- A three-phase project design was developed:
 - **Phase 1: document collection and analysis.** Participating schemes were asked to provide documents relating to their quality assurance processes (e.g., policies, procedures, reports, statistics, etc.).
 - **Phase 2: interviews.** The person(s) responsible for quality assurance in participating schemes were interviewed to fill in gaps arising from the documentary analysis conducted in phase 1.
 - **Phase 3: sense checking.** A summary of each participating scheme's approach to quality assurance was produced and shared with the scheme to allow any misunderstandings to be corrected. These summaries are available in Annex II.

3. The Legal Ombudsman's Current Approach

The organisation's current quality framework involves a number of elements:

- The first is the quality and feedback model, which ensures that checks are conducted at key points until a caseworker achieves competency, after which caseworkers investigate without checks (subject to *ad hoc* dip sampling to make sure competence

is maintained). The ongoing competency of ombudsmen is maintained through *ad hoc* moderation of decisions.

- The organisation's main quality assurance processes include Service Reviews, Outcome Reviews, or Combined Reviews, where cases are sampled and quality is assessed.
- Other feedback on casework includes ombudsman send backs (where a case is referred to an ombudsman but more investigation is required) and ombudsman feedback (provided on all cases referred to an ombudsman).
- In addition, feedback relating to quality is collected through customer satisfaction surveys, customer service complaints, and legal challenges.

All aspects of the organisation's work are subject to quality assurance checks. The General Enquiries Team and the Front-End Team's work is subject to Combined Reviews given the short time that these teams will generally spend working on a case. The work of investigators and ombudsmen are subject to both Service and Outcome Reviews.

In quarter 4 of 2022/ 23 a total of 425 cases were checked as part of the Service, Outcome or Combined Reviews. The breakdown of cases was as follows: General Enquiries Team (56 cases); Investigation Team – Service Review (115 cases); Investigation Team – Outcome Review (105 cases); Ombudsmen (37 cases); Front-End Team (39 cases). All checks are conducted on closed cases except the Investigation Team Service Review, which is conducted on live cases.

The organisation uses a set of customer principles aligned to organisational values to make quality assurance assessments. The values are: Open; Effective; Fair; and Independent. The customer service principles (each supported by more detailed criteria) are: We will always be clear with you (Open); We will be understanding and approachable (Open); We will make good use of everyone's time (Effective); We will be impartial, thorough and base our work on facts (Fair and Independent); We will make a difference.

The quality assurance team is small and currently composed of two members of staff. They have responsibility for overseeing quality processes and also for the commissioning and analysis of customer satisfaction data. Quality assurance checks are conducted by operational staff. Team Leaders conduct Service Reviews, while Ombudsmen conduct Outcome Reviews. The outcomes of Service, Outcome and Combined Reviews are fed back to individuals and a detailed analysis of outcomes is provided each quarter.

In addition, the organisation undertakes quarterly reporting to inform the business, the Office for Legal Complaints and key external stakeholders on how the organisation is performing. A Quality Committee considers the outcomes of quality reviews along with other metrics (customer satisfaction, service complaints, legal challenges) to identify trends and improvement).

The organisation surveys customers on completion of the complaint form, during an investigation, and upon case closure. The surveys are conducted by an external research company (except the complaint form survey). The surveys conducted during investigations provide (where a customer has indicated a willingness for their feedback to be linked to their case) an opportunity to deal with feedback and address any issues while the case is live.

4. Comparative analysis and key themes

4.1 Purpose and focus of quality assurance

4.1.1 Quality control and quality assurance

Most schemes in the sample use both quality control and quality assurance measures. However, there are differences within the sample with regard to:

- The extent to which quality control measures are included as part of a scheme's quality framework or seen as separate.
- The relative degree of reliance on either quality control or quality assurance measures in relation to a scheme's quality framework.
- The relationship between quality assurance and quality control measures.

Quality control is seen by some schemes as an important but separate issue, which does not come within the purview of their quality assurance framework. Scheme 2, for instance, referred to having a "system" to ensure quality which is composed of the following elements:

- Quality planning and service design (e.g., through pre-agreed sign-off levels for casework).
- Quality control (e.g., checking of "live" casework as it is being processed at an operational level).
- Quality assurance (e.g., retrospective checks to ensure that systems and processes are functioning as a whole).
- Quality governance (e.g., ensuring learning is acted upon).

Although not described in the same terms, many of the schemes in the sample similarly see quality assurance *per se* as only one of the measures undertaken to ensure quality within their scheme. Scheme 10, for example, uses a range of mechanisms to ensure quality, including: recruiting qualified staff and having a probation period to ensure competence; using standard processes and providing guidance to caseworkers; monitoring performance statistics and holding regular one-to-ones between managers and caseworkers; having all adjudications approved by a senior manager before being issued; and, finally, quality assurance checks.

Some schemes include quality control measures within their quality assurance frameworks and/ or do not necessarily distinguish between control and assurance measures. For instance, the bulk of Scheme 1's framework relates to ongoing managerial checks on live cases, tied to various levels of staff competence. Similarly, Scheme 6's quality assurance framework includes both a quality control process tying sign-off levels to the risk involved in a case, and a quality assurance process involving dip-sampling of cases.

Other schemes were more explicit in relation to differentiating between quality control and quality assurance measures and in setting out the relationship between the two sets of processes. Scheme 4's quality assurance framework, for example, includes three tiers. Tier 1 refers to ongoing quality control measures where a manager routinely conducts checks on open cases. Tier 2 refers to quality assurance checks, conducted by a separate quality team, which aim to provide assurance in relation to the Tier 1 checks conducted by managers. Tier 3 relates to the scheme's governance and oversight mechanisms, such as committee and reporting requirements

Some schemes, despite having various quality control measures in place, have not necessarily formalised these. Scheme 8 for example has a variable level of delegated authority for staff that depends on their level of experience and competence, but this is not formalised and the checking that takes place is left to managerial discretion. Scheme 9 does not currently include quality control within its framework but is working on developing a quality control framework to formalise its current approach.

Scheme 7 is notable in its reliance on quality control measures and light touch quality assurance approach. It uses contracted staff, supported by a core permanent team, for the bulk of its casework. Quality is primarily ensured through recruiting highly qualified individuals, with appropriate legal qualifications, and providing staff with a structured induction process. The extent to which a case will be reviewed and signed off before a decision is issued is dependent largely on the monetary value of the case. Retrospective dip-sampling only takes place to follow up on concerns about an individual's performance.

4.1.2 Values, performance, and learning

There were differences within the sample with regard to why schemes carry out quality assurance, what they hope to achieve as a result, and how their quality assurance frameworks fit in with their organisational objectives and values. There were three areas where different practices could be identified within the sample:

- Whether the focus of the quality assurance process is on individual performance, organisational learning, or accountability (or, more commonly, how these different objectives are balanced within a quality framework).
- Whether quality assurance systems and reporting adopt a largely qualitative approach or a largely quantitative approach.
- Whether the scheme prioritises providing internal and external assurance or empowering staff and demonstrating trust.

None of the schemes in the sample said that individual performance is the main aim of quality assurance. Scheme 7 is perhaps the exception, since its dip sampling checks are used primarily to follow up on individual performance concerns. Most schemes acknowledged that there is a connection between quality assurance and individual performance, but that this tends to be incidental. The main aim of quality assurance is usually described as being around assurance and improvement, with the focus being on assuring processes rather people.

Scheme 2, for example, noted that quality checks might highlight a performance or capability issue, but that individual performance processes are kept separate from quality assurance. For example, Scheme 2 said that quality assurance scores are not discussed at annual appraisals. This contrasts with Scheme 1, which sets an individual quality target for its staff, which is reviewed annually at progress meetings. Scheme 1 stressed however that the primary aim is always to ensure service improvement, and avoid a view that quality assurance is punitive or demoralising.

Scheme 3 also considered its focus to be on improvement, although it noted that as part of its revised quality assurance framework there would be a greater focus on individual performance. This is because its sampling strategy has moved from being entirely random (meaning some individuals' cases might not be checked at all) to one that mixes criteria-based and random sampling i.e., the criteria might be that at least two cases per caseworker are checked, but within that sampling frame cases would be identified randomly.

Indeed, it is in relation to sampling that schemes' focus, at least to some extent, on individual performance could become apparent, as most schemes would seek to ensure that a minimum amount of each caseworker's work is checked. Scheme 6 for example requires that every two months at least two of each caseworkers' cases should be dip-sampled. Scheme 11 also ensures that the sample, while drawn randomly from a list of cases, would ensure each caseworker's work is checked.

Scheme 4 was an exception. It uses a completely random sample, which aims to provide a statistically representative sample that can provide assurance about the organisation's performance but does not necessarily pick up on individual issues. This was described as being in keeping with the scheme's approach to quality assurance which is very much about providing assurance that quality control mechanisms are working well and where the focus is on systems and processes, not individuals.

Several schemes, while being clear that this is not the primary purpose of quality assurance, also noted that quality assurance checks could be used to follow up on individual performance. Scheme 5, for example, said that where a manager has concerns about a member of staff this could affect the extent and intensity of the quality assurance carried out on their work.

Connected, to some extent, to the tension between checking organisational performance and individual performance, there was some discussion of the relative value of qualitative as opposed to quantitative quality checks and reporting. Schemes 2 and 6, for example, discussed the difficulty of recording binary "pass/ fail" outcomes on cases, suggesting that the assessment of quality is inherently qualitative and that qualitative outcomes provide a better basis for discussing findings and potential improvements with staff. Scheme 2 said that their more qualitative approach to quality reflected their organisational values, and the emphasis it places on organisational learning. Scheme 6 similarly said that their more qualitative approach recognises the grey areas around quality assessments and prioritises maintaining good relationships with staff and a positive approach to quality over quantification.

Although all schemes use an element of qualitative assessment and feedback, some are more focused on quantitative outcomes and using quantitative scores as management information that could provide both assurance and identify areas where learning/ performance improvement is required. Not surprisingly, bigger schemes (such as Scheme 4 and Scheme 9) tend to have the most sophisticated and extensive systems of management information and a greater reliance on quantitative data. It is perhaps easier for smaller schemes to know what is happening in the organisation and to be able to rely on less formal approaches to quality.

Interestingly, Scheme 1 described their approach to quality as one that sought to ensure that staff feel empowered to deliver a good service and take good decisions. Their scheme emphasises high levels of delegation and autonomy, and the quality assurance process is designed to support/ not undermine this.

Similarly, Scheme 6 talked about the importance of trusting their staff. They noted that recruiting the right staff, providing the right training, the right guidance, and the right managerial support means that staff could mostly be trusted to work independently. They argued that quality assurance processes could end up taking up disproportionate organisational resources, undermining relationships with the organisation, and undermining staff's autonomy and their individual sense of responsibility for quality. Scheme 6 also noted that 100% consistency was neither achievable nor desirable, and that, within the boundaries of acceptable practice, there should be space for people having different styles and a certain amount of freedom in their approaches.

4.2 Scope of quality assurance

Most schemes in the sample have a quality assurance framework that extends across each stage of the organisation's casework process. The general approach to quality assurance is often similar at each stage, but bespoke quality assurance checks exist to recognise the different processes and outcomes at each stage. Very broadly, most schemes in the sample have three distinct stages: one which involves dealing with enquiries and registering complaints; one which involves seeking to resolve complaints at an early stage; one which involves a full investigation process.

Scheme 2's approach, for example, involves using quality assurance checklists based closely on the organisation's complaint handling guidance. Cases are sampled at all stages of the process and the quality assurance checks simply check that the complaint handling guidance has been followed up until the point at which a case is closed. Scheme 11 noted that although the broad principles applying to quality assurance are the same across each stage and area of their work, tailored scoring documents exist to reflect different processes operating with the organisation.

Scheme 9 has recently significantly expanded its quality assurance framework. Prior to 2021, quality assurance checks occurred mostly at the case set-up and investigation stages. This has since been expanded to cover: final decisions, the work of the customer call hub, the social media team, triage activities, and service complaints.

A smaller number of schemes have quality assurance frameworks that do not currently check the whole of their casework process, but where the intention is for this to be developed. Scheme 4, for example, currently only quality assures work at the primary and detailed investigation stages of its process. At present the work of the intake and early consideration team is only subject to routine quality control measures rather than quality assurance checks. However, a framework to cover these areas is currently being written. Similarly, Scheme 10 has set up a new triage team to help deal with Covid-related backlogs; no 'bespoke' quality check is yet in operation for triage, instead, a version of the pre-existing quality check, used for the Ombudsman team, is currently being used as a stop-gap whilst a more bespoke version is being developed.

4.3 Risk, proportionality, and flexibility

Most schemes seek to ensure that their quality assurance systems are proportionate, so that they deliver value (in terms of assurance and learning) while minimising the costs and burden involved in checking work. Some schemes refer to proportionality related issues within their frameworks. For example, Scheme 3, which has recently revised its quality assurance framework, has developed a set of principles to ensure proportionality:

- Relevance (only areas that need to be sampled will be).
- Sufficiency (an appropriate amount will be sampled to satisfy and determine outcomes).
- Currency (sampling will take place with consideration to the currency of cases to best support organisational feedback and practice).

In terms of how schemes ensure that their quality assurance frameworks are proportionate, risk-based, and sufficiently flexible to respond to developing organisational priorities, there are three broad sets of practices:

- Quality control processes which involve varying the volume of work being checked dependent on the seniority of caseworkers or the types of cases being dealt with.
- Ensuring that quality assurance processes are simplified and avoid double checking work.
- Using both routine quality assurance checks and thematic quality assurance projects so that particular areas of organisational risk can be addressed.

Scheme 1's quality control system involves staff having a competence rating. The more competent staff are considered to be within the rating system, the fewer checks their work will be subject to. In addition, a risk-based approach is taken when quality controlling cases: if no issues are discovered after a certain number of checks, no further checks will be carried out. If issues are uncovered, however, that might lead to more checks of a particular individual's work.

Scheme 6 operates a similar approach to quality control, except that alongside the competence of the caseworkers, the assessed risk inherent in particular types of case also determines the extent to which cases are checked. In Scheme 7, the extent to which quality control checks occur is largely determined by the value of the cases being dealt with. The higher the value of the case to the parties, the more likely that checks will be required before a decision is issued. Scheme 4 designates some cases as "high risk" or "systemic" and these are subject to high risk assurance meetings and oversight by the ombudsman or a deputy ombudsman.

While, as noted above, not all schemes consider quality control explicitly as part of their quality frameworks, most have some system of varying the level of quality control checks dependent on risk. Where schemes do not have these arrangements formally set out, it appears that managerial discretion is relied to determine when, how often, and on what cases checks are required.

In relation to routine quality assurance processes, some schemes referred to ways in which they seek to ensure proportionality. Scheme 2, for example, excludes certain types of cases from quality assurance on the basis that they are already subject to intensive checking: the cases of staff who are on probation and cases where the ombudsman has conducted a review are excluded from the quality assurance sample. As previously noted, some schemes operate a risk-based approach in relation to individual performance. Several schemes would vary their approach to sampling in order to follow up concerns about the performance of particular members of staff.

Scheme 9 referred to having priority areas within its quality framework. Although quality checks are conducted on a range of issues across a case, the organisation has identified certain checks as "priority areas". For example, for the investigation team there are 12 priority areas. The designation of priority areas is designed so that managers can focus on particular areas and not end up feeling overwhelmed, as well as ensuring that key areas of quality assurance are aligned to perceptions of risk.

Scheme 11 said it operates a risk-based approach where possible, which includes increasing checks in areas where the potential for error is higher. For example, this includes new recruits,

emerging areas of work for the organisation, new processes, or where managers flag concerns. Scheme 8 was conscious of the burden that quality assurance checks could impose on staff, noting that the pressure of delivering the organisation's core business could sometimes displace the focus on quality assurance. To address this, the organisation has simplified its quality assurance forms to make the process easier to administer and to involve less subjectivity. The scheme's process is now more driven by organisational priorities, rather than trying to include everything. As a result, the scheme conducts 1-2 "Roll-Royce" exercises a year, and then 3-4 more targeted exercises.

Indeed, a common mechanism for ensuring that quality assurance processes are responsive to risk and developing priorities is to conduct discrete quality assurance audits looking at particular themes or processes. Scheme 9, for example, carries out quarterly deep dives in response to particular risks identified in the organisation. Around 12-15 deep dives are conducted a year. Similarly Scheme 2 uses quality assurance audits to look at areas identified as risky. Recently, it has carried out a quality assurance project looking at decisions to close cases on the grounds that it would not be proportionate to examine a case further, since this is an area that the scheme wants to ensure is being looked at consistently across caseworkers.

4.4 Sampling methodologies

4.4.1 Open or closed cases, or concluded activities?

Schemes in the sample took different approaches with regard to:

- Whether only closed cases, open cases, or both are sampled.
- Whether the unit of analysis for quality assurance is particular activities or whole cases.

It was common for schemes to report that open cases are the focus of quality control, while closed cases are the focus of quality assurance. Scheme 4, for example, differentiates clearly within their quality framework between Tier 1 (quality control where open cases are checked prior to decisions being issued) and Tier 2 (quality assurance where closed cases are checked retrospectively). Scheme 2 follows a similar approach and noted that the purpose of quality assurance is to provide assurance that systems and processes are working as intended. Their view is that conducting quality assurance on open cases would be a duplication of effort.

Scheme 5 also only quality assures closed cases, noting that quality assuring open cases risks slowing down the casework process and that the organisation's aim is to empower caseworkers. Second guessing their work in the course of a live investigation would therefore not be in keeping with how the organisation sees quality assurance.

Other schemes include checks on both open and closed cases, largely because the criteria for selecting cases is not whether they are open or closed but whether certain activities have been completed or milestones reached. For these schemes, the purpose of the quality assurance is not to check whole cases, but to check particular activities. Scheme 3 adopts this approach and explained that, given the backlog they are dealing with and the long timescales for closing some cases, quality assuring only closed cases would not be appropriate. Sampling open cases means that real time feedback can be obtained and there is also the opportunity to correct any issues while the case is open. Scheme 3 noted that feedback to staff on live cases could also be more meaningful and more likely to be acted upon.

Scheme 9 also uses an approach where the conclusion of activities, rather than (necessarily) case closure provides the trigger for quality assurance checks. Their quality assurance checks occur one week after a particular activity has been concluded, in order to allow any issues or problems to be remedied with minimal detriment to the parties. Similarly, Scheme 11 checks cases at particular milestones, some of which involve the movement of cases between teams rather than closure.

4.4.2 Random, purposive, or mixed samples?

Most schemes in the sample use at least some elements of randomness within their sampling. The exception is Scheme 7 which, as discussed above, draws its samples purely on the basis of following up particular concerns raised about individual performance.

Most schemes reported selecting cases at random but noted that this could be amended to take account of particular risks or staff issues. It is also common for cases to be drawn at random, but only following the application of certain sampling criteria. Scheme 3, for example, makes sure that its quality assurance sample includes all caseworkers, and this is a very common approach across the sample. Scheme 9, similarly, adopts a random approach but with a pre-set number of checks per individual: for example, in its call centre, it conducts “business as usual checking” on 1 in every 73 calls per person in relation to inbound calls.

Scheme 4’s approach is unusual in not using sampling criteria seeking to quality assure every caseworker’s cases. Instead, their sample is entirely random and aims to achieve a statistically viable sample that is representative of the population of cases dealt with by the organisation. The rationale for this approach is that, if the aim of quality assurance is to check individuals’ casework rather than provide assurance with regard to the operation of systems and processes, then a much larger sample of cases would be needed. In addition, since issues regarding individuals are seen as a quality control matter for operational managers to deal with, this sampling choice reflects the organisation’s emphasis on quality assurance fulfilling a different and additional purpose (i.e. assurance and learning).

4.4.3 Sample size

There is significant variation within the sample in relation to sample size, as shown in the table below. Only Scheme 4 and Scheme 9 provided a clear rationale for their sample size selection – both these schemes said that the sample size they use is designed to produce a representative sample. Other schemes either selected sample size based on experience over time or based on discussions of practice with other ombudsman schemes. It is difficult to compare sample sizes approaches between schemes, because some schemes use a total % figure across their casework while others sample at different frequencies for different aspects of their work. In addition, not all schemes report their sampling strategies as a percentage.

Scheme	Sample size approach
1	Does not have a set percentage of cases that it samples, as the sample is based on the competence level of staff. Once staff achieve full competence the aim is for two cases per staff member to be checked every quarter. In addition to ongoing checks, Scheme 1 carries out a bi-annual audit. The sample size is again not set but aims to adopt a risk-based and proportionate approach.
2	Scheme 2 samples 10% (or 40 cases, whichever is greater) of all closed cases each year across each casework area. For the risk-based quality assurance checks, there is no set % of cases sampled and this varies flexibly depending on the nature of the area being looked into.

- 3 Scheme 3 is on the cusp of introducing a new approach to quality assurance. This involves checking particular aspects of a case rather than whole cases, so that more cases are sampled but fewer areas are considered within each case. Provisional numbers suggest around 30% - 40% of cases would be sampled in some way over each 6-month period across all investigating officers.
- 4 The organisation aims to draw a statistically viable sample (SVS) (this is the number of cases needed to provide confidence that the sample is reflective of the organisation-wide position). This is calculated using a sample size calculator. The approach to sampling aims to gather an SVS proportionate to each aspect of the organisation's work.
- 5 Overall quality checks are conducted on 10-15% of cases, a figure considered "both proportionate and manageable". For the intake team, 6 cases per intake team member are quality assured every 6 months. 5% of cases reviewed by the assessment team and 10% of cases reviewed by the investigation team are checked. Quality checks of statements of reasons are made on a random sample of cases, although specific themes and selection criteria can be identified. These checks are conducted three times a year at a statement of reasons review meeting. 20 cases are sampled three times a year. Decisions on sample size are pragmatic and based on experience around what works for the organisation.
- 6 The number of cases that are subject to the casework quality advice process (i.e. quality control checks) varies, depending on the level of risk assigned to cases at any given time, but around 15 – 20% of the organisation's cases are subject to casework quality advice. In terms of quality assurance, managers are expected to dip sample 6 cases every two months, usually on cases closed during the previous month.
- 7 There is no set % of cases sampled on a regular basis. Dip sampling does happen on a reasonably frequent basis, however, where something anomalous in a case raises concerns. A few of an individual's cases may be looked at and that can be widened if there is evidence to substantiate concerns.
- 8 The organisation dealt with 1211 cases last year. The organisation looks at about 10% of cases at the initial assessment stage; then would look at 20 – 40 cases at the initial investigation stage; and 8 – 10 cases at the investigation stage. A recent thematic quality assurance exercise looked at decision-making around the existence of alternative remedies and used a sample of 55 cases.
- 9 From April 2023, quality checks on investigations will involve a 5% random sample of cases. Ombudsman Leaders check two cases per month, resulting in Ombudsman Managers having one of their cases checked per quarter. 1 in 33 decisions of Associate Ombudsman a month are checked and there is one check per Decision Ombudsman per month. The work of the customer call centre involves business as usual checking on 1 in every 73 calls per person in relation to inbound calls. Checks on case set up occur on every 40th conversion per call handler. Quality checks on responses to service complaints occur on every 15th final service complaint response. Checks on social media replies involve 21 quality checks completed weekly, with the starting point being an equal amount per assistant per week. The quality team performs "check the checker checks" on around 250 technical checks per quarter. From April 2023,

	the quality team will be completing 150 process checks per quarter per directorate.
10	5% of closed cases are randomly sampled, this amounts to about 40 cases being checked per month. The 5% figure is a contractual obligation for running one of the dispute resolution schemes run by the organisation. In addition, 10 cases per quarter are reviewed and discussed by the organisation's Standards Board. The organisation operates a service complaints procedure. This has two stages: Stage 1 involves a review by the caseworker responsible for the case; Stage 2 is carried out by the lead ombudsman. All files subject to a Stage 2 complaint are subject to a quality check.
11	Quality assurance checks are carried out on phone calls and cases, with checks tailored to the kind of work being carried out and the stage of the complaint journey. Checks are conducted at key milestones, for example when a case moves between stages of the customer journey or to and back from legal. Cases are checked at initial application stage, assessment stage and adjudication stage. Some checks are carried out on open cases (e.g. cases that are being moved from assessment to adjudication). 10% of each team's cases are sampled. This figure was chosen based on straw poll of what other ombudsman schemes were doing at the time. Cases are sampled randomly from a list of case reference numbers. However, while the cases are picked at random, the sampling ensures that within each team, each person's work is subject to quality checks.

4.5 Quality assurance criteria

4.5.1 Criteria and checklists

Most schemes use a combination of high-level criteria (either principles or service standards) supported by detailed checklists in order to conduct quality assurance checks. Some schemes use external criteria (such as the Ombudsman Association's service standards or those in the caseworker competency framework). Others use their own criteria. There is variation in the level of detail which quality checklists go into. For example, in some schemes, broad criteria are used as the basis for making qualitative assessments. However, in most schemes, detailed lists of questions that can be answered yes/ no are used. The table below details the approach of each scheme in the sample.

Scheme	Criteria
1	Scheme 1 uses four criteria to structure their quality assurance work: robust and reasoned, accessible and accurate, and progressed and processed. The criteria are supported by checklists that include detailed questions which check compliance with specific organisational processes and expectations.
2	Scheme 2's quality assurance process uses questions derived from the organisation's complaint handling guidance and its service standards. The service standards are organised under three commitments: we will communicate effectively with you; we will work in an open and fair way; and we will carry out our duties competently and responsibly. Each of these commitments is supported by more detailed standards, for instance, around transparency, fairness, and impartiality and independence. The quality sheets

used for ongoing quality assurance checks include 42 questions. Risk-based quality assurance sheets vary in length and focus; an example was provided of a form used for a risk-based quality check of professional advice. The form has 16 questions checking areas such as: clarity of advice; qualifications of the adviser; completion of paperwork; fairness and impartiality; standards employed; references to best practice; timescales; etc.

- 3** Scheme 3 uses its service standards as the main basis for evaluating quality. The service standards are as follows: We will ensure that our service is accessible to all; We will communicate effectively with you; We will ensure that you receive a professional service from us; We will be fair in our dealings with you; We will operate in a transparent way. In addition to the service standards, the focus of the framework is on ensuring: consistency of service, professionalism and customer service, efficiency of service, improvement and development of good practice, and supportive and transparent working practices. Quality assurance sheets are used where questions can be varied, but they consistently seek to establish whether service standards are being met.
- 4** Scheme 4 has a set of quality standards, divided into those relating to decisions, service, and process. Those related to process include: we are transparent about our process and how we apply it to reach our decisions and recommendations; we request evidence that is proportionate to the complaint at the right time; we follow clear guidance to deliver outcomes at the right time; we adhere to relevant legislation and policy; we keep clear and accurate records; we use feedback to continually improve our service; we spend a proportionate amount of time on a complaint to the impact we can make. At a more granular level, every case is checked against decision standards – there are 22 decisions standards of which 8 are critical. The quality assurance team mark all 22 but report on 8 critical ones; this is to keep the focus on quality manageable for operations managers. There is scope for some flexibility and the standards considered “critical” can be amended, where necessary.
- 5** The organisation quality assures its casework against seven quality standards: our service is easy to access; we take full account of what people tell us and treat them with courtesy and respect; we deal with each case promptly, from first contact to final decision; the remedies we recommend are proportionate and appropriate; we exercise our discretion fairly and consistently and are transparent about the process we follow; our investigations and assessments are impartial, and we make clear, evidence-based decisions; our record keeping is accurate, and we ensure that the data we hold is kept secure and confidential; we use the outcomes of complaints to promote wider service improvement and learning. In addition, the organisation uses quality check forms which set out more detailed criteria. For example, the quality checks on statements of reasons use a form which checks three principles (satisfying complainants; legally sound; and clear) and includes the seven standards and 13 more detailed measures against these standards.
- 6** Assessments of quality tend to be qualitative and based on a table that asks about: whether the decision is sound, fair, and proportionate; whether any areas of good practice by the provider are identified; whether the complaint is resolved at the earliest possible stage; whether the decision is explained clearly; whether a good quality service is provided; whether there are any training or development needs; whether the caseworker displays kindness. The areas asked about are amended annually to reflect organisational priorities.

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|-----------|---|
| 7 | The organisation uses the Ombudsman Association’s Caseworker Competency Framework as the basis for evaluating quality. The framework organises competency requirements under the following headings: analytical; impactful; approachable; professional; open minded; constructive. |
| 8 | Quality checks cover four areas. File management, which looks at whether data is entered and stored correctly. Process, which looks at whether procedures are followed and KPIs are met. Communication, which includes communication with the complainant, the organisation complained about, and internal communication (such as with advisers). Decision-making, which looks at the quality of the decision, its logic, rationality, proportionality and clarity of communication. |
| 9 | Strategic quality metrics align with key customer, quality and service expectations throughout the case journey. Standardised quality checklists are used. Investigation checks cover jurisdiction, approach, view, outcome. Decision checks cover customer service, jurisdiction, approach, decision and outcome. Call centre checks look at the quality of telephone calls and include looking at the start of the enquiry, customer service, progressing the enquiry, basic data and end of the enquiry. Case set up checks look at searches, complaint data, customer requirements, operational warnings, customer service. Service complaint checks involve service complaint data, service complaint SLAs, response, and outcome. Within each area certain checks are considered “priority areas” reflecting the particular focus of the organisation at a given point in time. |
| 10 | The scheme’s Standards Board uses the Ombudsman Association’s Service Standards to assess quality: accessibility, communication, professionalism, fairness and transparency. A form setting out the standards and allowing for a qualitative assessment of the case is used by Standards Board members and the results are discussed at quarterly meetings. A quality assurance spreadsheet is used to perform the main quality assurance checks. |
| 11 | In Scheme 11, a checklist is used with a number of questions (the checklist for the adjudication team has 30 questions). These ask whether key actions have been completed at each stage of the process. The questions are answered yes/no with a space for comments. The questions focus on process, service, and communication (rather than the substance of decisions). Each team has its own specific checklist. Some staff use these to make sure that they have completed all actions on a case. |

4.5.2 Checking process, service, or outcomes?

Most schemes’ quality assurance approaches review all aspects of caseworkers’ work, including the process followed, the service delivered to the parties, and the outcome. Scheme 1 said that as part of its quality control mechanisms, managers check decisions prior to them being issued, so that ongoing quality control is more focused on outcomes. The periodic quality assurance audit, however, includes consideration of both process and outcome. Consideration of all aspects of casework is common and reflects the practice of Schemes 2, 5, 6, 9, and 10.

Scheme 8 said that although it’s quality assurance framework considers both process and outcome, the focus was more on process. Schemes 3 and 11 were unusual within the sample,

in that their quality assurance framework focused on process only. Scheme 3's quality framework is described as a "service quality framework" and this is indicative of the fact it is focused on the quality of the service provided. The quality of decisions is subject to both ongoing quality control checks and the decision review procedure, which allows parties to challenge a decision on limited grounds.

Scheme 11, similarly, does not include assessments of decisions within its quality framework. They explained that decisions are subject to other controls including the fact that if complainants disagree with a proposal for an early resolution, they can ask for a case to be adjudicated. Once at that stage, all opinions are signed off by the Opinion Review Group before being issued. Where a complainant is dissatisfied, they can request for the ombudsman to reach a final determination, which is subject to appeal to the courts on a point of law.

4.5.3 Describing quality assurance outcomes

Many schemes use a Red, Amber, Green (RAG) rating to summarise the outcomes of their quality assessment checks. The exact meaning of these ratings differs between schemes. Scheme 1, for example, defines red as "not acceptable", amber as "acceptable", and green as "good"; Scheme 2 defines red as "must do/ remember", amber "to be aware of", and green "good/ best practice". Scheme 4 provides a detailed guidance document explaining what each rating means in relation to each of its quality standards so that quality assessments can be objective and staff are clear on what "good looks like". Scheme 4 uses a RAGG system, where the second "G" stands for gold, a rating used where quality standards are exceeded.

Even where schemes allow for more qualitative feedback within their quality assurance checks, most use questions that can be answered "yes/ no" or "pass/ fail". The overall score for a case is commonly determined by calculating the percentage of passes and having certain overall thresholds for particular ratings. Scheme 11, uses a slightly difference approach, where each question is scored (rather than having binary questions that are then converted to an overall rating). A green rating is defined as a "good customer experience" and two ratings are available: 100 for "pass with excellence" and 85 for "some minor areas for development" (e.g. typos). An amber rating is defined as "needs improvement" and three ratings are available: 79 means "two areas for development", 65 means "three areas for development", and 51 means "four or more areas for development"; red is defined as the service not meeting expectations, resulting in a negative impact on the customer, and a rating of 40 is given in these cases.

Some schemes do not use a RAG rating and instead summarise the outcomes of cases using a percentage score showing the extent to which quality measures are met in the case. Scheme 9 uses standardised quality checklists involving a yes/ no answer, which are then expressed as a percentage. Cases are given the following ratings: 95%+ meets the required standard, 94.99% - 85% opportunities for improvement, less than 85% does not meet required standard. Scheme 10 scores each question on its checklist out of 2 or 4. Cases are scored out of 68 in total and a final percentage is produced. There is no official target but the organisation would generally hope to see scores above 80%. There is also the possibility of recording an "instant fail" against any question. An instant fail is recorded for: not logging phone calls, not adhering to service level agreements in terms of response times, failing to fully explain the decision to both parties, not correctly labelling attachments/documents, data security breaches.

As noted above, Scheme 6 uses a more qualitative approach and does not seek to score cases in a way that could then be used to provide a quantitative assessment of quality across cases. Scheme 7 also uses an approach which is qualitative rather than relying on checklists

or scoring mechanisms. In Scheme 10, although the main quality assurance exercise uses a binary scoring mechanism, the assessment of quality carried out by its Standards Board is more qualitative. Other schemes did include a space for qualitative comments in their quality checklists but this is additional to the use of binary questions. Scheme 8 said that it has simplified its quality checklists so that they make less use of qualitative assessments and adopt a more binary approach, in order to save time.

4.6 Resourcing quality assurance

4.6.1 Specialist or integrated quality assurance checks?

There is variation in the sample with regard to whether quality assurance is conducted by specialist staff, by operational managers or by a combination of the two.

Scheme 1 uses its operational managers for conducting quality assurance checks. A degree of impartiality in relation to checking work is ensured by regularly rotating staff between teams. Scheme 5 has a Professional Practice Coordinator responsible for designing and overseeing the operation of quality processes, but managers conduct the actual quality assurance checks. The strengths of having quality as a responsibility of managers is that quality is owned by the teams, lessons can be learned and implemented immediately, and there are clear lines of accountability. The drawback is that it is additional work on top of routine management, which can be difficult to manage. Scheme 6 reported the advantages of using managers to conduct casework in similar terms, but this scheme also involves heads of casework and organisational leaders in dip-sampling cases.

Some schemes use a panel approach, where checking of cases is initially done on an individual basis by managers, but the results are then discussed to reach a consensus view at a panel. Scheme 5, for example, samples a number of cases for its Statement of Reasons panel. Members score the cases individually and then discuss them as a group. This is time-consuming but considered to be very valuable for providing individual and whole team feedback.

Scheme 8 uses a quality assurance panel composed of the Director of Investigations and 4 Senior Investigation Officers. Each quarter the quality assurance panel decides what will be the focus of the quality assurance and they carry out the checks. The organisation would like to have someone whose role is dedicated to quality as currently quality can become a victim of other pressing business. The quality assurance panel's approach, however, is helpful as there is a lot of experience on the panel and results of the quality assurance can be fed back directly into improvements. On the other hand, having a dedicated member of staff somewhat removed from the management structure could lead to robust questioning and not working from assumptions.

Scheme 9 is unusual in using a mixture of specialist staff and operational managers and decision-makers to carry out quality assurance checks. One of the quality framework's principles is that the person carrying out checks on a case should be independent of the person whose work is being checked. The quality team is responsible for training individuals conducting quality checks. The central quality team quality assures the process, while checks with regard to the technical correctness of decisions are conducted by approved checkers within pods (typically ombudsmen and more senior staff). The organisation has recently moved from resourcing the Quality Team with secondees from the operation to permanent roles.

There is also a desire for individuals in the team to see quality as a discrete and valuable career trajectory. Some quality assurance staff are undertaking Chartered Institute for Quality training.

Other schemes operate quality assurance on a purely centralised model rather than devolving the responsibility in whole or in part to operational staff. Scheme 2 uses a secondment approach, where two caseworkers are seconded to the role of Executive Casework Officers. These staff members conduct quality checks and are also responsible for assisting the ombudsman with requests to review decisions. In Scheme 3, a single quality officer is responsible for conducting quality checks. In Scheme 4, a team of 11 quality officers manages the quality process. While quality control is performed by managers, quality assurance is conducted independently by the quality assurance team.

Scheme 11's quality assurance team is composed of a Quality Assurance Manager and 3 Quality Assurance Officers. The team sits independently from the rest of the organisation. This allows checks to be independent and for trends and issues to be spotted in a way that line managers might not be able to. Because the quality assurance team focuses on customer interactions and service, the team do not need to have expert knowledge of the substantive casework issues.

Scheme 10 is unusual within the sample in that its quality checks are carried out independently. The routine quality checks are conducted by an independent person to enhance the legitimacy and independence of the quality process. In addition, the Standards Board reviews a cross-section of adjudications, and is responsible for overseeing rules, practices and procedures. The Standards Board is composed of a mix of academics, trading standard officers, consumer representatives, and businesses.

4.7 Feedback and reporting

4.7.1 How are outcomes fed back to individuals?

Most schemes share completed quality assurance checklists with the particular caseworker, so that they can see how the case has been assessed. Scheme 7 is an exception as they do not use a formal checklist and Scheme 8 use a form but do not routinely share this with staff. In most schemes, return of the completed checklist is also accompanied with a discussion by the caseworker's manager where the quality assurance process has picked up a problem.

Some schemes provide generic feedback and lessons learned from quality assurance, so that staff can be alerted to particular themes and trends. Scheme 4 also uses other feedback mechanisms including the use of intranet pages to share learning and the opportunity for staff to "buddy" with quality assurance officers. Scheme 2 similarly offers caseworkers the opportunity to shadow the quality assurance process, so that they can get a better understanding of the quality framework and how it is assessed. Scheme 9 uses a dashboard, where staff can find their individual quality assurance scores on an ongoing basis.

In most schemes, individual feedback is primarily directed at caseworkers. Scheme 4 stood out within the sample, as its quality assurance process is directed at ensuring that the quality control processes operated by managers are working effectively. As a result, feedback in relation to issues picked up during the quality assurance is provided to managers. Feedback

to individual caseworkers happens in the course of the scheme's routine quality control processes.

4.7.2 Where and how data are reported

Each scheme's governance arrangements are unique meaning that the specific groups or boards which oversee quality assurance and receive quality reports in each scheme are all quite different. Generally, findings are reported to senior manager groups (e.g., Senior Management Team), committees with a remit for quality, and, where schemes have a Board, the Board receive summary quality reports. There are some differences between schemes in relation to whether they report the findings of quality assurance processes publicly. Schemes 3, 6, and 8, for example, use quality assurance data as an internal assurance mechanism rather than one for external stakeholders.

In terms of how data is reported, Scheme 2 presents the outcomes of quality assurance as a qualitative lessons-learned report to its Audit Advisory Board and a section on quality is also included in the annual report. Similarly, Scheme 6's quality assurance outcomes are reported qualitatively. Others use more quantitative measures, using the RAG scores or percentage scores discussed earlier as the basis for reporting outcomes and monitoring trends. As noted above, the different governance arrangements and nomenclature used for groups and committees within schemes, mean that it is hard both to compare different practices and to generalise about approaches. Giving a few examples may help demonstrate the range of practice in this area:

- Scheme 4's quality assurance scores are reported weekly; coaching and 121 sessions and the production of an overall quality dashboard take place monthly; a balanced scorecard is reported to the Board quarterly, with quality measures and service user feedback reported to the Quality Committee also reported quarterly. The two main KPIs reported against relate to the correctness of a decision and whether it is publishable (i.e. well communicated).
- Scheme 9's quarterly feedback reports are produced by the quality team for each pod/area. There is also daily reporting through an online dashboard. The data is broken down for each team. For investigation checks, an overall score is given for jurisdiction, view, outcome and approach and more detailed scores are available for specific questions beneath this. The quality dashboard also includes other quality metrics such as customer satisfaction, the rate of ombudsman referrals, and decision return rate. Action logs for serious failings are monitored by quality team.
- In Scheme 10, a quarterly quality report is produced which records: number of cases closed; service complaints received; number of quality checks (inc. top score, range, median, and number of fails); key themes; key actions.

Most schemes said that their quality assurance reports are considered by the organisation alongside a range of other data. For example:

- Customer satisfaction data (both from formal customer surveys and the collection of *ad hoc* feedback).
- Outcomes of service delivery complaints (including the outcomes of reports by Independent Reviewers where schemes had appointed one).
- Outcomes of requests for review of decisions or feedback from the ombudsman.
- Other sources of feedback, such as legal challenges.

In all cases, these other forms of data were used to triangulate the results of quality assurance checks and to provide a broader picture of quality across the organisation. Data from these different sources was not linked at case level (for example, service complaint outcomes and customer satisfaction scores were not linked back to specific cases).

5. Benchmarking insights and critical questions

5.1 Preliminary points

As the comparative analysis above has shown, there are both broad commonalities of approach across the sector, as well as clear areas of divergence. It has not been within the scope of this project to investigate empirically the relative effectiveness of any of these approaches. Comparisons between schemes are highly challenging given their different oversight and governance arrangements, roles, sizes, structures, and processes. This report is not therefore in a position to identify “good practice” that can simply be extracted from one context and used elsewhere.

The report neither has the evidence-base to assess whether practices are “good” or “bad”, nor can clear conclusions be drawn that what works in the particular context of one scheme, will work elsewhere. Instead, the analysis above and the scheme summaries in Annex II, are designed to be used by the Legal Ombudsman as a prompt for reflection and to provide inspiration with regard to the range of options that are available to the organisation as it reviews its quality assurance processes.

This concluding section of the report, provides a summary of the benchmarking insights generated through the project and some critical questions that are designed to guide the Legal Ombudsman’s review of its quality framework.

5.2 Purpose and focus of quality assurance

5.2.1 Quality control and quality assurance

Benchmarking insight

There is a need for clarity in relation to classifying measures as quality control or quality assurance. Setting an appropriate level of quality assurance depends on the extent and intensity of quality control measures used by a scheme. Where staff have significant autonomy and delegated authority, there may be a greater need for reliance on quality assurance measures to provide managerial insight and assurance with regard to quality. Where quality control measures are extensive, a lighter touch quality assurance approach may be more appropriate. There is also a question for reflection around whether quality assurance processes are checking a scheme’s primary systems and processes or restricted to ensuring the effectiveness of quality control measures. If quality assurance systems are restricted to checking that quality control is working as intended, this may result in more light touch systems of quality assurance. Generally, there is a need to consider the overall amount of quality checking (control and assurance) that occurs within a scheme when calibrating quality assurance processes.

Critical questions

- A. Does the quality assurance framework distinguish sufficiently between quality control and quality assurance measures?
- B. Are quality control measures specified with sufficient precision within the quality assurance framework so that the total volume of quality checking within the organisation is known?
- C. Should quality assurance processes seek to assess the quality of caseworkers' work or of quality control measures?
- D. Is there an appropriate balance within the quality assurance framework between resources invested in quality control measures and those invested in quality assurance?

5.2.2 Values, performance, and learning

Benchmarking insight

There is a need to be clear about the balance to be achieved between various legitimate purposes of quality assurance: individual performance, providing internal and/ or external assurance, and organisational learning. Principled decisions with regard to where the organisation's focus should be have an impact on specific aspects of quality assurance such as sampling, how quality outcomes are recorded, and how these outcomes are reported and used within the organisation. Most schemes emphasise either assurance or learning but maintain at least some focus on individual performance. The degree to which outcomes are quantified depends to some extent on the size of the scheme, but also the degree to which quality outcomes are for external consumption. In addition to considering the purposes that quality assurance seeks to serve, there is a relationship between quality assurance systems and delivering an organisation's values. There is some potential for quality assurance processes to undermine the delivery of other organisational objectives if they are not appropriately calibrated and aligned.

Critical questions

- E. Does the quality assurance framework clearly specify the purposes and intended outcomes of quality assurance?
- F. To what extent should checking individual performance be included within the quality assurance framework?
- G. Where checking individual performance is a focus of the quality assurance framework, should this be a matter for quality control or quality assurance measures?
- H. Are the organisation's stated intentions regarding the purposes and outcomes of the quality framework reflected in its sampling approach and how quality assurance outcomes are recorded and used?
- I. Is the quality assurance framework aligned with, and does it actively support, the organisation's priorities, values, and culture?

5.3 Scope of quality assurance

Benchmarking insight

Schemes in the sample have quality assurance processes that either cover their end-to-end casework process or they have plans to ensure this is the case. Schemes use quality assurance checklists that are tailored to the work of the particular teams being quality assured. A number of schemes have recently extended their quality assurance framework or plan to do so to account for changes in the organisation's processes. There are differences in terms of how quality assurance is calibrated at each stage of the process. For example, some areas might be subject to more or less checking depending on the volume of cases dealt with at a particular stage and the extent to which an area of work is perceived as carrying risks to the organisation.

Critical questions

- J. Does the quality assurance framework include all aspects of the organisation's casework process?
- K. Are different aspects of the casework process sampled on a differentiated basis to take into account (a) the degree of organisational risk at a particular stage of the casework process and (b) the extensiveness of quality control checks in place at a particular stage?

5.4 Risk, proportionality, and flexibility

Benchmarking insight

Most schemes seek to include risk-based elements within their quality assurance frameworks and to ensure that the value of quality assurance outputs is proportionate to the costs and burdens involved in checking work. Quality control mechanisms often vary in intensity depending on risk, usually because of risk related to caseworker competence or the high value/ risk inherent in particular cases. Many schemes also seek to adopt proportionate approaches by not double-checking work that is already subject to review under other processes. Some schemes focus on particular priorities within their routine quality assurance processes or mix full audits with more targeted ones, in recognition of the limited resources they have available. Several schemes use thematic approaches on top of ongoing quality assurance, so that particular areas of risk can be addressed.

Critical questions

- L. Is the quality assurance framework based on a clear analysis of areas which are risky for the organisation and/ or subject to known problems and concerns?
- M. Where quality assurance scores are consistently high in particular areas and/ or at particular stages of a casework process, does the quality framework allow for checks to be reduced and/ or put into abeyance for a set period of time?
- N. Does the quality assurance framework avoid double-checking work?

- O. Does the quality assurance framework provide the opportunity for conducting thematic quality assurance audits linked to particular organisational priorities and areas of current organisational risk?
- P. Where the quality assurance framework provides for thematic audits, what is the appropriate balance of effort to be invested in routine quality assurance and thematic audit?

5.5 Sampling methodologies

5.5.1 Open or closed cases, or concluded activities?

Benchmarking insight

Some schemes only include closed cases within their quality assurance samples, on the basis that quality control processes are responsible for checking ongoing work on open cases. The retrospective nature of the quality assurance process is seen as in keeping with the purpose of quality assurance to provide assurance and organisational learning, rather than as an add-on to operational management. Other schemes' quality assurance samples are drawn not on the basis of whether a case is open or closed, but on the basis of whether particular activities have been concluded. This means that checks would be considered at key milestones in the life of a case, including but not exclusively case closure.

Critical questions

- Q. Does the quality assurance framework sample closed, live, or a mix of cases and is the sampling approach in this regard aligned to the stated purpose and intended outcomes of the quality assurance framework?
- R. If the quality assurance framework includes live cases within quality assurance processes, how do such checks complement/ align with ongoing quality control measures?
- S. Should the trigger for initiating quality assurance be the closure of a case or the conclusion of a particular activity or milestone?

5.5.2 Random, purposive, or mixed samples?

Benchmarking insight

Most schemes do not use entirely random sampling methodologies. This allows for risk-based strategies that ensure quality assurance is sensitive to particular issues, usually related to individual performance. It is interesting that despite most schemes suggesting that individual performance is not a focus of their quality assurance system, their sampling strategies retain a focus on ensuring that all individuals are sampled. The tension noted above between checking individual performance and quality assuring processes is most evident in relation to sampling choices. Scheme 4's approach is distinctive in this regard, with its sampling approach very strongly aligned to what it sees as the purpose of quality assurance (i.e. checking quality control arrangements rather than caseworker performance).

Critical questions

- T. Does the quality assurance framework include an explicit rationale for its choice of sampling methodology?
- U. What is the unit of analysis in relation to which quality assurance is conducted – is it an individual staff member, a team, an activity, or a milestone?
- V. If criteria-based or purposive sampling is used in addition to random sampling, do the criteria for selection align with the stated purposes and intended outcomes of the quality assurance framework?
- W. And, if criteria-based sampling is used, do such criteria align with the organisation's analysis of organisational risk?

5.5.3 Sample size

Benchmarking insight

There is a wide variety of different approaches to sampling, which reflects the way in which different schemes operate. The rationale for using particular sample sizes is often not explicit and appears to be based around experience of what works in practice. Some schemes use a more explicit sampling strategy and aim to select a statistically representative sample.

Critical questions

- X. Does the quality assurance framework include a clear rationale for the size of the quality assurance sample relative to the total population of casework?
- Y. Does the quality assurance framework's sampling approach provide statistically generalisable findings and would this assist the organisation in meeting the stated purpose and intended outcomes of its quality assurance framework?
- Z. Does the organisation's quality assurance framework allow for variations in sample size based on a range of factors such as:
 - Whether consistently high scores are achieved in particular areas
 - Whether the organisation's limited resources or sudden changes (e.g. Covid, increase in complaints, etc) require a shift in the balance between assuring quality and delivering primary operational services
 - Whether particular areas have been highlighted as particular risky/ problematic
- AA. Does the organisation's quality assurance framework allow for differentiated sample sizes at particular stages of the process, to reflect variations in volume, importance, and relative risk of work being conducted?

5.6 Quality assurance criteria

5.6.1 Criteria and checklists

Benchmarking insight

There is variation between schemes in terms of the criteria used and the types and number of questions included in quality assurance checklists. These reflect different organisational priorities and reflect the different requirements in relation to complaint handling processes and expectations around decision-making in different schemes. While the criteria are expressed differently, they all tend to cover common elements around the quality of process, quality of service, and quality of decision-making (with some exceptions as discussed in the next section). Quality checklists tend to be very detailed and reflect the expectations of the organisation's case handling processes, all of which are different between schemes. One issue in relation to criteria relates to the tension between wanting to cover all aspects of casework and wanting to keep checklists manageable and the outcomes of quality assurance understandable for caseworkers and managers. Two schemes highlighted particular areas as critical/ priority areas, which allowed all areas of work to be checked, but flagged particular aspects of the work as critical.

Critical questions

- BB. Does the quality assurance framework clearly set out the criteria against which quality will be assessed and are checklists and forms clearly aligned with these criteria?
- CC. Does the quality assurance framework achieve an appropriate balance between comprehensiveness and proportionality in relation to the range of matters subject to quality assessment?
- DD. Does the quality assurance framework allow for criteria, forms, and checklists to be varied in response to changing organisational risks and priorities?
- EE. Does the quality assurance framework distinguish between checks which are critical and non-critical and, if it does, is there a clear rationale for maintain non-critical checks within the framework?

5.6.2 Checking process, service or outcome

Benchmarking insight

As noted above, there is a question for schemes in relation to how broad their quality checks should be and whether they should seek to cover all aspects of their work or focus on particular areas. Most schemes cover process, service, and outcomes. A few schemes only cover process or have process as the dominant focus of quality assurance. There are advantages with regard to this in terms of the objectivity and speed with which quality assurance checks may be made. There is also the potential to use more impartial staffing arrangements where quality checks are not considering the quality of substantive decisions which are often highly technical and require expert knowledge. The appropriateness of limiting the quality assurance to process and service comes down in part to organisational needs and priorities, and the way in which quality control mechanisms are designed and operated. As noted above, quality control and quality assurance need to be considered together to ensure that a total system of quality operates effectively and proportionately. If

an organisation is confident in the quality control mechanisms pertaining to outcomes and the procedures available to detect decision-making errors, then an emphasis on process may make sense. This raises an interesting question about the level and type of assurance that particular organisations and their stakeholders require. For some organisations, assurance of the quality of outcomes is provided through other means than quality assurance checking.

Critical questions

- FF. Should the quality assurance framework include consideration of process, service, and outcome, or focus on only some of these aspects?
- GG. What quality control mechanisms exist for checking and reviewing outcomes (e.g. managerial sign off, availability of review by senior decision-maker) within the organisation?
- HH. What quality control mechanisms exist for checking process and service within the organisation?
- II. What do the answers to questions (GG) and (HH) suggest should be the appropriate focus and extent of quality assurance arrangements?

5.6.3 Describing quality outcomes

Benchmarking insight

It is common for schemes to record the outcome of individual checks and overall case checks using a binary pass/ fail approach which can then be converted into a RAG rating. Some schemes do not use a RAG rating but express the overall score as a percentage, with threshold percentages ascribed a particular rating. Most schemes provide an opportunity for qualitative feedback to be provided, which is important where unsatisfactory ratings are being given. A couple of schemes use more qualitative approaches, or have aspects of their quality assurance processes that are more focused on making qualitative assessments. Such assessments can be more time consuming to carry out and also more difficult to report to senior leaders and stakeholders. On the other hand, they may be more meaningful in terms of the feedback they provide and their ability to pick up on nuances in quality. Overall, there is a need for schemes to consider the balance between qualitative and quantitative assessment and feedback within overall quality frameworks.

Critical questions

- JJ. Does the quality assurance framework provide a good balance between reporting outcomes in a manner than can be quantified and in a manner that reflects the qualitative dimensions of quality?
- KK. What are the relative costs and benefits to the organisation associated with qualitative and quantitative approaches to assessment and reporting?
- LL. How does the balance between quantitative and qualitative reporting of quality outcomes align with the purposes and intended outcomes of the quality assurance framework?

5.7 Resourcing quality assurance

Benchmarking insight

The question of who should conduct quality assurance checks depends in part on what criteria are being applied. Where the emphasis of quality assurance is on process and service, impartial quality assurance staff without detailed technical knowledge of casework can be used to conduct checks. Where the emphasis is on decision-making, quality assurance staff either need to have substantial casework knowledge or a bifurcated approach may be more appropriate where process and outcome checks are carried out by different people in the organisation. Secondments are one way of ensuring that quality assurance staff have detailed technical knowledge, while being somewhat removed from operations. Some schemes (Scheme 3 and 4) have employed quality assurance specialists, while Scheme 9 is seeking to professionalise its approach to quality by some staff undergoing Chartered Institute of Quality training. There is a real question about what types of skills and degree of impartiality is required for effective quality assurance and the range of approaches within the sample reflects this.

In addition to skills and impartiality, there is also a question around the credibility of quality assurance findings within the organisation. For example, Scheme 4 ensures that its quality officers have the same status as managers to ensure that findings are taken seriously. Generally, the use of either specialist teams/ individuals or operational managers each has advantages and disadvantages. Specialist teams are more impartial, can provide an external perspective, and are not as affected by organisational group think. They may also bring particular skills (e.g. service quality backgrounds) that can genuinely add value to the organisation. Operational managers on the other hand are able to consider technical matters as well as process issues, can effect changes immediately and are in a better position to feedback learning to staff. Giving them responsibility to quality checking also ensures that quality is owned by staff, rather than quality being perceived as something external to operational processes.

Critical questions

- MM. Does the quality assurance framework provide an explicit rationale for whether quality assurance processes (or aspects of these processes) are conducted separately by a quality team/ officer or by operational managers?
- NN. Does the quality assurance framework clearly define what skills, knowledge and experience are required of those undertaking quality assurance checks?
- OO. Where the quality assurance framework distinguishes between the assurance of process and service and the assurance of outcomes, does the quality assurance framework clearly define what skills, knowledge and experience are required for those undertaking each type of quality assurance check?
- PP. Does the quality assurance framework describe the training required for (a) operational staff responsible for conducting quality checks and (b) specialist quality assurance staff?
- QQ. Do the staffing arrangements for quality assurance, overall, provide an appropriate balance between impartiality and expertise?
- RR. Does the quality assurance framework involve any entirely independent actors in quality checking?

SS. Does the quality assurance framework provide a clear rationale for resourcing central quality assurance teams/ officers on a permanent basis or through internal secondments?

5.8 Feedback and reporting

5.8.1 How outcomes are fed back to individuals

Benchmarking insight

The findings of quality assurance processes are usually fed back to the individuals whose cases have been checked. This usually involves sharing quality assurance checklists and having a discussion with a manager where necessary. Some schemes also provide generic feedback to caseworkers on quality issues arising from quality checks, while others also offer opportunities for buddying/ shadowing to allow caseworkers to get more insight into quality. One scheme uses a sophisticated dashboard where individuals can see their quality scores as well as access completed checklists. In one scheme feedback is provided to managers, rather than caseworkers, reflecting the purpose of that organisation quality assurance as a check on managerial quality control processes.

Critical questions

TT. Does the quality assurance framework provide an appropriate range of feedback to staff, identifying both individual issues and general themes?

UU. Does the quality assurance framework provide opportunities for staff to gain an understanding of quality requirements and processes (such as through appropriate guidance, buddying, coaching or shadowing opportunities, or through the use of self and peer assessment)?

VV. Who is quality assurance primarily targeted at (caseworkers, managers, or both) and does this appropriately reflect the purpose and intended outcomes of the quality assurance framework?

5.8.2 Where and how data are reported

Benchmarking insight

The differences between where schemes report data seem largely to be driven by different organisational and governance structures. All schemes broadly report data in the same way, using it for management and governance oversight. Data is usually reported in a quantified format, using RAG ratings or percentage figures, supplemented by qualitative summaries of lessons learned. A smaller number of schemes report mostly qualitative data. One clear difference is between schemes which report their quality assurance results publicly and those which only use their quality assurance data internally.

Critical questions

WW. Are data reported in a manner that ensures an appropriate balance between quantitative and qualitative information about quality?

XX. How far are data reporting requirements (and indeed quality arrangements in general) driven by a need to provide external assurance to stakeholders as opposed to providing internal value for senior managers within the organisation?

YY. Do quality reports integrate a broad range of quality-related data, including customer satisfaction, quality audit outcomes, service complaints, and other forms of organisational feedback?

6. Conclusion

This report has described, and provided a comparative analysis of, the approaches to quality assurance of 11 UK ombudsman schemes (schemes). The aim of the report was to inform the Legal Ombudsman's review of its quality assurance framework. The report has analysed approaches to quality assurance across the following dimensions:

- Purpose and focus of quality assurance
- Scope of quality assurance
- Risk, proportionality, and flexibility
- Sampling methodologies
- Quality assurance criteria
- Resourcing quality assurance
- Feedback and reporting

Across each of the above dimensions there were both areas of commonality and areas of divergence between schemes. There were significant differences between schemes in the sample in terms of their roles, the complaints they deal with, their size, processes, structures, and their oversight and governance arrangements. Each scheme's quality assurance arrangements were tailored to the organisation's particular needs and their particular context, at the same time as operating within a broadly comparable framework in which quality was widely recognised as an important priority for schemes.

In drawing lessons from the report's analysis for the Legal Ombudsman, the following points are important to note:

- This project has not carried out an evaluation of the effectiveness of different approaches to quality assurance within the sample.
- Even if it had, the context-specific nature of many practices and approaches suggest that what might work for one organisation may not work for another.
- This report's principal value lies in providing the Legal Ombudsman with comparative perspectives and inspiration with regard to the options implemented by other schemes.

As a result, this report does not conclude by identifying a set of "best practices" or a particular model for assessing the quality of casework that can be applied more broadly. Instead, a set of "benchmarking insights" have been provided which summarise key issues arising from the

benchmarking exercise. These are coupled with a set of “critical questions”, designed to provide an aid for the Legal Ombudsman’s review of its quality assurance framework.

The report has provided 51 critical questions across each of the dimensions noted above and these form the practical output of this project (see Annex I for a summary). The critical questions may also prove valuable for other schemes interested in assessing or reviewing their current quality assurance arrangements.

That the report provides questions for reflection rather than recommendations for implementation is indicative of the fact that multiple, reasonable approaches can be taken to quality in the ombudsman context. What approach is taken may depend, among other things, on organisational size, degree of staff turnover, stability or change in organisational remit, increases or decreases in complaint volumes, availability of resources, and stakeholder context and expectations. There is no one-size-fits-all solution.

7. Annex I – summary of critical questions

Quality control and quality assurance

- A. Does the quality assurance framework distinguish sufficiently between quality control and quality assurance measures?
- B. Are quality control measures specified with sufficient precision within the quality assurance framework so that the total volume of quality checking within the organisation is known?
- C. Should quality assurance processes seek to assess the quality of caseworkers' work or of quality control measures?
- D. Is there an appropriate balance within the quality assurance framework between resources invested in quality control measures and those invested in quality assurance?

Values, performance, and learning

- E. Does the quality assurance framework clearly specify the purposes and intended outcomes of quality assurance?
- F. To what extent should checking individual performance be included within the quality assurance framework?
- G. Where checking individual performance is a focus of the quality assurance framework, should this be a matter for quality control or quality assurance measures?
- H. Are the organisation's stated intentions regarding the purposes and outcomes of the quality framework reflected in its sampling approach and how quality assurance outcomes are recorded and used?
- I. Is the quality assurance framework aligned with, and does it actively support, the organisation's priorities, values, and culture?

Scope of quality assurance

- J. Does the quality assurance framework include all aspects of the organisation's casework process?
- K. Are different aspects of the casework process sampled on a differentiated basis to take into account (a) the degree of organisational risk at a particular stage of the casework process and (b) the extensiveness of quality control checks in place at a particular stage?

Risk, proportionality and flexibility

- L. Is the quality assurance framework based on a clear analysis of areas which are risky for the organisation and/ or subject to known problems and concerns?
- M. Where quality assurance scores are consistently high in particular areas and/ or at particular stages of a casework process, does the quality framework allow for checks to be reduced and/ or put into abeyance for a set period of time?

- N. Does the quality assurance framework avoid double-checking work?
- O. Does the quality assurance framework provide the opportunity for conducting thematic quality assurance audits linked to particular organisational priorities and areas of current organisational risk?
- P. Where the quality assurance framework provides for thematic audits, what is the appropriate balance of effort to be invested in routine quality assurance and thematic audit?

Live or closed cases, or concluded activities?

- Q. Does the quality assurance framework sample closed, live, or a mix of cases and is the sampling approach in this regard aligned to the stated purpose and intended outcomes of the quality assurance framework?
- R. If the quality assurance framework includes live cases within quality assurance processes, how do such checks complement/ align with ongoing quality control measures?
- S. Should the trigger for initiating quality assurance be the closure of a case or the conclusion of a particular activity or milestone?

Random, purposive or mixed samples?

- T. Does the quality assurance framework include an explicit rationale for its choice of sampling methodology?
- U. What is the unit of analysis in relation to which quality assurance is conducted – is it an individual staff member, a team, an activity, or a milestone?
- V. If criteria-based or purposive sampling is used in addition to random sampling, do the criteria for selection align with the stated purposes and intended outcomes of the quality assurance framework?
- W. And, if criteria-based sampling is used, do such criteria align with the organisation's analysis of organisational risk?

Sample size

- X. Does the quality assurance framework include a clear rationale for the size of the quality assurance sample relative to the total population of casework?
- Y. Does the quality assurance framework's sampling approach provide statistically generalisable findings and would this assist the organisation in meeting the stated purpose and intended outcomes of its quality assurance framework?
- Z. Does the organisation's quality assurance framework allow for variations in sample size based on a range of factors such as:
- Whether consistently high scores are achieved in particular areas

- Whether the organisation's limited resources or sudden changes (e.g. Covid, increase in complaints, etc) require a shift in the balance between assuring quality and delivering primary operational services
- Whether particular areas have been highlighted as particular risky/ problematic

AA. Does the organisation's quality assurance framework allow for differentiated sample sizes at particular stages of the process, to reflect variations in volume, importance, and relative risk of work being conducted?

Criteria and checklists

BB. Does the quality assurance framework clearly set out the criteria against which quality will be assessed and are checklists and forms clearly aligned with these criteria?

CC. Does the quality assurance framework achieve an appropriate balance between comprehensiveness and proportionality in relation to the range of matters subject to quality assessment?

DD. Does the quality assurance framework allow for criteria, forms, and checklists to be varied in response to changing organisational risks and priorities?

EE. Does the quality assurance framework distinguish between checks which are critical and non-critical and, if it does, is there a clear rationale for maintain non-critical checks within the framework?

Checking process, service or outcome

FF. Should the quality assurance framework include consideration of process, service, and outcome, or focus on only some of these aspects?

GG. What quality control mechanisms exist for checking and reviewing outcomes (e.g. managerial sign off, availability of review by senior decision-maker) within the organisation?

HH. What quality control mechanisms exist for checking process and service within the organisation?

II. What do the answers to questions (GG) and (HH) suggest should be the appropriate focus and extent of quality assurance arrangements?

Describing quality outcomes

JJ. Does the quality assurance framework provide a good balance between reporting outcomes in a manner than can be quantified and in a manner that reflects the qualitative dimensions of quality?

KK. What are the relative costs and benefits to the organisation associated with qualitative and quantitative approaches to assessment and reporting?

LL. How does the balance between quantitative and qualitative reporting of quality outcomes align with the purposes and intended outcomes of the quality assurance framework?

Resourcing quality assurance

- MM. Does the quality assurance framework provide an explicit rationale for whether quality assurance processes (or aspects of these processes) are conducted separately by a quality team/ officer or by operational managers?
- NN. Does the quality assurance framework clearly define what skills, knowledge and experience are required of those undertaking quality assurance checks?
- OO. Where the quality assurance framework distinguishes between the assurance of process and service and the assurance of outcomes, does the quality assurance framework clearly define what skills, knowledge and experience are required for those undertaking each type of quality assurance check?
- PP. Does the quality assurance framework describe the training required for (a) operational staff responsible for conducting quality checks and (b) specialist quality assurance staff?
- QQ. Do the staffing arrangements for quality assurance, overall, provide an appropriate balance between impartiality and expertise?
- RR. Does the quality assurance framework involve any entirely independent actors in quality checking?
- SS. Does the quality assurance framework provide a clear rationale for resourcing central quality assurance teams/ officers on a permanent basis or through internal secondments?

Individual feedback

- TT. Does the quality assurance framework provide an appropriate range of feedback to staff, identifying both individual issues and general themes?
- UU. Does the quality assurance framework provide opportunities for staff to gain an understanding of quality requirements and processes (such as through appropriate guidance, buddying, coaching or shadowing opportunities, or through the use of self and peer assessment)?
- VV. Who is quality assurance primarily targeted at (caseworkers, managers, or both) and does this appropriately reflect the purpose and intended outcomes of the quality assurance framework?

Where and how data is reported

- WW. Is data reported in a manner that ensures an appropriate balance between quantitative and qualitative information about quality?
- XX. How far are data reporting requirements (and indeed quality arrangements in general) driven by a need to provide external assurance to stakeholders as opposed to providing internal value for senior managers within the organisation?
- YY. Do quality reports integrate a broad range of quality-related data, including customer satisfaction, quality audit outcomes, service complaints, and other forms of organisational feedback?

8. Annex II – Approaches to quality assurance of ombudsman schemes in the sample

8.1 Scheme 1

Quality framework and policies overview

The Quality Framework (the Framework) was created retrospectively, reflecting quality practices that had built up overtime. The ethos of the Framework is to help staff deliver a good service, rather than being punitive or demoralizing. Board approval is required for changes to the Framework, but in keeping with the desire for agility within the organisation, operational changes (such as changing the % of cases sampled) can be made operationally and then reported to the Board for noting.

The quality assurance life cycle contains five areas: aiming to get it right first time; managing the quality of work in progress; systematic sampling – identifying issues for learning; making quality and performance matter; and learning and improvement. There are two main quality assurance processes undertaken under the framework: ongoing quality assurance checks of individual cases, focused on the quality of decisions; and bi-annual case audits, where the focus is not only on the decisions being issued, but the whole of the casework process.

In addition to the Framework, which relates to the provision on ongoing assurance to the Audit Committee and Board, the organisation undertakes discrete quality improvement projects. Themes include the work of a new Service Experience Team (using service design techniques to improve customer access and experience) and the ‘delivering clarity’ work improving our communication using everything from technology (involving automated tools to improve ‘plain English’ through to updating templates).

Approach to early resolution cases

The framework was reviewed in 2022 and updated to include quality monitoring at enquiries and mediation stage to widen the comprehensiveness of the framework. Enquiries and mediations amount to a very small amount of the organisation’s intellectual work. The criteria (see below) applied to quality assuring this work are the same but the emphasis is different. For example, in relation to enquiries, the focus is much more on the “progressed and processed” criterion, rather than those relating to decision-making. Separate quality assurance sheets are used for this work, where the emphasis is more on issues like speed and service rather than the quality of a staff member’s reasoning.

Approach to proportionality

A risk-based approach is built into the Framework. The extent to which a member of staff’s decisions will be subject to quality assurance checks is dependent on their level of experience and competence. When a new member of staff joins, they are on level 4 and all of their work is checked by a training manager. Staff then progress to level 3, where all cases are checked by a qualified QA manager. At level 2, most cases are checked by peers, with only a couple of cases checked by a manager. At level 1, peer review quality checks will be undertaken in “some cases”, with manager checks becoming exceptional (although a minimum of two cases per quarter are checked). In relation to the bi-annual quality assurance audits, a risk-based approach is taken. Where it is clear from sampling a small number of cases decided by a particular member of staff that there are no quality issues, no further checks will be carried out. Where issues are picked up and need to be explored, a larger sample of cases will be examined.

Approach to case sampling

Cases for quality assurance are selected randomly. Quality assurance checks are conducted on live cases only (i.e. those that have yet to be closed). This is because (a) staff

are more likely to pay attention to feedback when the case is live rather than historic and (b) the quality process offers the opportunity to adjust approaches in real time, rather than spotting errors after the fact. There is no set % of cases which the organisation aims to quality assure. As noted above, quality checks on decisions are undertaken with decreasing frequency as staff gain experience and move from level 4 to level 1. Once they are at level 1, the aim is for 2 cases to be quality checked per caseworker per quarter. The bi-annual audit of cases also adopts a risk based approach, rather than aiming to sample a particular proportion of casework.

Quality assurance matrix and criteria

The organisation uses three broad criteria – robust and reasoned, accessible and accurate, and progressed and processed. Robust and reasoned refers to how evidence was evaluated and conclusions drawn, focusing on the decision and its reasoning. Accessible and accurate focuses on explanations provided to the parties, and the accuracy and clarity of communication. Progresses and processed refers to speed, keeping parties informed, and the case management process. These are rated as either “not acceptable” (red), “acceptable” (amber), or “good” (green). Each criterion is supported by a list of questions and a QA sheet is completed to show how each area has been rated. There are different QA sheets for eligibility and decisions carried out by investigation teams and the work carried out at the enquiries and mediation stages. Generally, there has been a development over time in the organisation’s approach which previously focused mostly on the quality of final decisions. Now, the assurance process includes the whole casework journey and the service provided as well as the quality of final outcomes.

Quality assurance staff and resourcing

The Chief Executive Officer is accountable managerially for all aspects of the business. A non-executive Board sets strategy and holds the CEO to account. The CEO chairs an SMT and delegates responsibility to particular SMT members. The SMT review data and compliance to ensure the organisation’s quality standards are met. The Director of Resolution sets, monitors and assesses compliance with the quality framework with input from the Investigation Management Team in relation to all aspects of the framework (excluding formal determinations). Quality assurance checks themselves are undertaken either by peers or team managers (or both). Managers are rotated to different teams every three years which helps reduce risk and ensure a degree of detachment. Training on quality assurance occurs through area meetings in specific areas of the business.

Feedback on individual cases

There are different ways in which individual feedback is provided. QA sheets are returned to individuals, but this may also be accompanied by a conversation. There is an opportunity for staff to challenge assessments. In terms of feedback from the bi-annual quality audits, managers email every member of staff on every audit. If there are criticisms a discussion will be had. A group email is sent to highlight wider learning and good practice. Staff are given a QA score target annually and quality assurance performance forms part of staff’s annual progress review. Where performance is found wanting, this can trigger performance processes, although the general approach is to seek to support and develop staff through the quality process. Caseworkers can also receive feedback on aspects of casework from the Board, which is responsible for final determinations and from cases that are subject to appeal.

Reporting of quality assurance data

Quality assurance data is reported quarterly to the Board. The target is for less than or equal to 5% of cases being rated “red” (not acceptable) at any stage of the process. The Board also considers a range of other evidence in assessing the quality of the service provided by

staff, and the point was made that specific quality assurance checks were only one part of the work carried out by the organisation to ensure quality.

Capturing customer feedback and satisfaction

The organisation is currently looking to develop its approach to collecting customer feedback; it has yet to find a good model which separates out people's unhappiness with outcomes from their experience of their process. The organisation is sceptical of being able to use customer feedback as part of the quality assessment of specific cases, as this feedback is not objective and may be perceived as unfair by staff.

Use of quality assurance data for wider improvement

The QA process feeds into organisational improvement efforts. Recently, QA checks highlighted that the timescales for staff reaching level 1 competence were too long and could be shortened. The Framework identifies a range of potential outcomes from the QA depending on whether errors are individual errors, errors within teams, or errors resulting from systemic problems. The QA process sometimes highlights that practice has moved on for justified reasons and that processes themselves need to be updated.

8.2 Scheme 2

Quality frameworks and policies overview

The organisation's approach to quality is strongly connected to the culture of the organisation. This is manifested by separating the quality assurance process from the organisation's individual performance management system and by adopting a qualitative approach to feeding back and reporting findings. The aim of the quality assurance system is to assure the organisation that its complaint handling guidance and service standards are being followed, and to allow for learning and improvement.

The quality assurance "system" recognises that there is a distinction between i) quality planning and design of services to build in quality (eg through pre agreed sign off levels, taking account of risk), ii) quality control (ie the act of checking 'live' casework as it is being progressed at an operational level), iii) quality assurance which looks at the way in which our systems and processes are functioning as a whole providing assurance that they are operating effectively and making recommendations for improvement, and iv) quality governance which ensures learning is acted upon.

The organisation carries out two types of quality assurance: ongoing checks of cases and risk-based quality assurance where a particular area is selected. The organisation does not have a quality framework document as such. Instead, there is a section on quality in the organisation's complaint handling guidance. The main documentation is the quality assurance sheets, which set out a series of questions to be answered during quality assurance checks, and quality assurance reports which summarise findings.

The quality assurance process sits within a wider quality framework that involves: a casework assessment form allowing structured decision-making; sign-off authorisation levels for all casework, meaning that higher risk decisions and areas require higher level sign-off; regular training; access to support from communities of practice, external trainers, and option to call case conferences; peer review and joint working of cases; the option to call a significant reflective review (in-depth and systematic reviews that are undertaken where an organisational failure has been identified); and a right to ask the Ombudsman to review decisions taken under delegated powers.

Approach to early resolution cases

The quality assurance sheets closely follow the organization's complaint handling guidance. As such, quality assurance of cases that are closed at an early-stage check that guidance has been complied with up until that stage. There is no separate approach to early resolution cases. The organisation's service standards also apply equally to this work. However, the organisation has used its risk-based quality assurance process specifically to look at cases that are closed on proportionality grounds (where it is decided at an early stage that it would be disproportionate for the organisation to consider a case further).

Approach to proportionality

The organisation's risk-based quality assurance process is particularly used where a new process is being implemented or where there are indications that checks might be required (e.g. if there is a high level of challenge to particular decisions). The risk-based approach involves creating a scoping document for each risk-based quality assurance process, which sets out how the process will be carried out and sets out bespoke questions which the quality assurance checks will address. In terms of the routine quality assurance checks, probationary staff are excluded (since their work is already subject to a high level of managerial checking), as are cases where an individual has requested a review (as these files are reviewed by the Ombudsman). Although cases are generally sampled on a random basis, this may be supplemented with risk-based sampling (e.g. if there are areas or particular staff members where there are indications of quality concerns).

Approach to case sampling

10% (or 40 cases, whichever of greater) of all closed cases are randomly sampled each year across each casework area. For the risk-based quality assurance checks, there is no set % of cases sampled and this varies flexibly depending on the nature of the area being looked into. The Director and Ombudsman can request that a case be reopened following QA to ensure that the parties are not disadvantaged. The practice of sampling closed cases was seen as less disruptive than sampling live cases. For live cases, the organisation's expectation was that ordinary casework checking processes, conducted by managers and depending on the level of experience and competence of caseworkers, would pick up any errors. The quality assurance process was not designed to duplicate that work, but to give assurance that complaint handling guidance and service standards were being adhered to and to flag areas where learning and improvement might be possible.

Quality assurance matrix and criteria

The quality assurance process uses questions derived from the organisation's complaint handling guidance and its service standards. The service standards are organised under three commitments: we will communicate effectively with you; we will work in an open and fair way; and we will carry out our duties competently and responsibly. Each of these commitments is supported by more detailed standards, for instance, around transparency, fairness, and impartiality and independence. The quality sheets used for the ongoing quality assurance checks include 42 questions. Risk-based quality assurance sheets vary in length and focus; an example was provided of a form used for a risk-based quality check of professional advice. The form has 16 questions checking areas such as: clarity of advice; qualifications of the adviser; completion of paperwork; fairness and impartiality; standards employed; referenced to best practice; timescales; etc. Quality assured cases are assessed as either red (must do/ remember), amber (to be aware of) or green (good/ best practice).

Quality assurance staff and resourcing

Quality assurance checks are conducted by two Executive Casework Officers (ECOs), who are seconded caseworkers. There are two ECOs and 32 caseworkers within the organisation. ECOs also deal with requests for reviews of casework decisions and have a key role in developing the organisation's complaint handling guidance. ECOs have in-depth knowledge of the organisation's complaint handling guidance and service standards and do not sit within the casework teams, ensuring an impartial outlook. Where quality assurance is conducted by multiple members of staff, each person reviews a few cases and compares notes to ensure a consistent approach. The quality of the quality assurance checks themselves is assured by giving staff and managers the opportunity to discuss findings and raise challenges where there are concerns about the approach an ECO has taken.

Feedback on individual cases

Quality assurance feedback is shared with members of staff and can be discussed on request. A manager may be involved as required. Reports of findings and recommendations are shared with managers for discussion and signed off by the leadership team. Individual staff are encouraged to shadow the quality assurance process to help understand the approach. While quality assurance processes may highlight a performance issue, the processes are entirely separate. Quality assurance results are not discussed at annual appraisals for example. The aim is very much to ensure learning and to support individual and organisational development.

Reporting of quality assurance data

A summary of the QA results is presented in the annual report. This is presented as a qualitative account of lessons learned. The organisation's preference is not to present statistical information, in part because this might drive dysfunctional behaviour and also because this would take away from the main value of the quality assurance process which

is to ensure organisational learning. A qualitative approach fits better with the organisation's culture and this demonstrates that the quality assurance process is not about scoring people or catching them out. In addition to publication in the annual report, a summary of quality assurance findings is presented to the organisation's Audit Advisory Board. While the general approach is qualitative, the organisation does work to a performance indicator requiring that 95% of cases subject to quality assurance checks will be found to be correct.

Capturing customer feedback and satisfaction

A quarterly customer feedback survey is carried out internally by staff, although this has recently been suspended because of the burden on staff time. The organisation is considering using external research providers instead. In addition to the feedback survey, feedback is provided by the Independent Service Delivery Reviewer, who considers complaints about the organisation's service and reports on these annually. The Reviewer also carries out an annual audit (of around 15 cases that have been subject to a service complaint) to assess the customer service provided. In addition, staff are encouraged to share and record unsolicited feedback received in the course of casework. Service complaints and customer feedback are separate from the quality assurance process – feedback is not linked to particular cases and not used as part of quality assessments.

Use of quality assurance data for wider improvement

There are opportunities for operational learning resulting from the quality assurance process and common recommendations are around staff training, the need to update processes, and areas where additional advice may be required. Given the maturity of the organisation, and the clear standards and guidance it operates, the quality assurance process is not expected to highlight areas for radical change. Instead, it provides an opportunity to check existing systems are working and being complied with, and to highlight where those systems might need adjusting to take account of developing practices and changing circumstances.

8.3 Scheme 3

Quality frameworks and policies overview

The organisation has been reviewing its approach with a new system to be implemented in April (this summary relates to the new framework). The emphasis of the quality framework is on service quality rather than quality assurance. Service quality has more of a focus on the customer journey and aims to occur in real time as well as after the event. The organisation has appointed a new Service Quality Officer, with expertise in service quality. The aim of the service quality framework is to understand the level of provision at each stage of the process; evidence and formally record success; and to support improvement and development.

Approach to early resolution cases

The organisation has always been keen to resolve cases early where that is appropriate, while still looking out for patterns and learning from cases. There has not been a particular increase in early resolution although as the organisation's caseload increases, early resolution become increasingly important. The organisation's service quality framework samples all stages of the process: intake, assessment, and investigation. There had been discussion in the organisation about whether sampling should be the same % across each area of the process, or whether a higher % of cases should be sampled in some areas rather than others (perhaps proportionate to the amount of time and effort invested into cases).

Approach to proportionality

The organisation is dealing with a large increase in cases. As timescales for dealing with cases are stretched, it becomes more important to communicate well with customers and keep them informed, and the service quality framework can help with that. Dealing with live cases as opposed to only checking closed cases is a means of ensuring that the service quality framework is aligned to organisational priorities. The service quality checks are in addition to the normal managerial oversight and, for investigated cases, peer review of reports. The service quality checks are underpinned by the following principles that relate to a proportionate approach: relevance (only areas that need to be sampled will be); sufficiency (an appropriate amount will be sampled to satisfy and determine outcomes); currency (sampling will take place with consideration to the currency of cases to best support organisational feedback and practice). As the service quality approach is embedded, there will be an opportunity to tailor it to focus on any themes or patterns (whether these relate to particular types of cases or particular tasks or activities in our work.)

Approach to case sampling

The organisation samples closed and live cases. Live cases are included on the basis that it is more meaningful for staff and allows ongoing issues to be fixed. If the sample is only at the end of a case then the outcome may colour the assessment of service quality; looking at a case in real time allows the service quality checks to focus on how service is being delivered as the case progresses. Some cases can take over 12 months to conclude, so leaving quality checks until a case is closed is not considered appropriate. Providing ongoing checks allows for formative and ongoing feedback to be provided.

The organisation's approach to sampling tries to make sure that within each part of the organisation's work, all members of staff's work is being checked and so the selection process is not entirely random. While a random sample might produce reliable results for the whole organisation, it will not pick up individual issues if a person's cases are not selected. The sampling approach can also be tweaked to follow up on any concerns about someone's work, although in general the aim is for the checks to be supportive and not add to pressure on staff who are already under pressure with high caseloads. Generally, there will be more frequent checks of staff within their first year of appointment.

As noted above, the organisation has moved away from sampling only closed cases and for checks to include the entire case journey. Instead, checks are more focused on aspects of the cases rather than 100% of case content. This allows more cases to be reviewed, but

with a more targeted focus on particular issues within the case. The focus of the open case sample is on compliance with procedural requirements and ensuring a good customer journey, allowing any issues to be fixed in real time. The purpose of the closed case sample is to look more at decision-making and to provide assurance about the end-to end customer journey. The sampling approach can also be varied to look at particular themes.

Quality assurance matrix and criteria

The organisation uses its service standards as the main basis for evaluating quality. The service standards are as follows: *We will ensure that our service is accessible to all; We will communicate effectively with you; We will ensure that you receive a professional service from us; We will be fair in our dealings with you; We will operate in a transparent way.* In addition to the service standards, the focus of the framework is on ensuring: consistency of service, professionalism and customer service, efficiency of service, improvement and development of good practice, and supportive and transparent working practices.

Quality assurance sheets are used where questions can be varied, but they consistently seek to establish whether service standards are being met. There needs to be a balance in the service quality framework between setting clear expectations for staff and allowing organisational flexibility to respond to circumstances. Significant changes to the approach would need to be consulted on with staff. The outcome of the service quality checks is an assessment of the case as red, amber or green, but the focus is on assessing the piece of work rather than the member of staff.

Quality assurance staff and resourcing

The organisation has a specialist service quality role with a single person responsible for quality assurance. That person has a background in service quality but not in casework. Casework knowledge can be built up over time, but there is a tension in terms of the skills required to conduct quality assurance. The case review process (where casework decisions are challenged and therefore reviewed by the Lead Review Officer) provides an insight into the quality of casework decisions. The organisation is also planning to introduce a process whereby staff self assess one of their own cases and have a peer assessment of one case a year to help staff understand the service quality approach.

Feedback on individual cases

In the revised service quality framework there is a little bit more emphasis on individual performance in the sense that the aim is to ensure that everyone's work is subject to least some checks. Generally the service quality framework is separate from performance management and the aim is not to grade or rank staff. It would be rare for a formal performance management issue to arise directly from the service quality checks, but findings could feed into annual reviews and training / development discussions. The aim is to focus on development and providing training and support. In terms of individual feedback, this is done by line managers and picked up at monthly meetings.

Reporting of quality assurance data

Data is reported with overall RAG scores alongside a qualitative summary of areas to improve and what is working well. The service quality framework is there to give assurance to the ombudsman and management; the aim is not to report the findings externally. The findings are shared with the organisation's Management Team and Advisory Panel for scrutiny and discussion.

Capturing customer feedback and satisfaction

Customer satisfaction surveys are carried out externally on an annual basis. The results are not tied to individual cases and the feedback is used alongside service quality checks (rather than being used as data to assist checks). The surveys help identify overall trends and issues. Feedback is also received in the form of requests for reviews of decisions and service quality complaints. Where these processes pick up mistakes or service failings that is discussed by managers with the member of staff.

Use of quality assurance data for wider improvement

The service quality process results in identification of themes and learning points for action within the organisation. The aim of the process is to support learning and improvement.

8.4 Scheme 4

Quality frameworks and policies overview

The organisation's quality assurance framework (the framework) aims to assure the quality of the casework process, the service provided to complainants, and decision making. This includes assuring the quality of decision letters and final reports, as well as providing assurance of quality standards in relation to the organisation's systems. The framework also aims to provide assurance that bodies subject to investigation implement recommendations in line with the organisation's guidance.

The framework distinguishes between quality control (processes that take place during the event to ensure issues are avoided/ mitigated and standards maintained) and quality assurance (processes that take place after the event to provide assurance that the result, outcome or performance was as expected). The organisation uses four groups of "tools" as part of its overall approach to quality: strategy, policy and guidance (e.g. quality strategy, quality standards); training (e.g. accreditation, coaching, CPD); assurance (e.g. the quality framework, quality measures); and continuous improvement (e.g. casework discussions, workshops for complaint investigators).

The framework sets out three "tiers of assurance". Tier 1 focuses on open cases and involves the conduct of quality surveys by operations manager, which sample a minimum number of each caseworker's open cases every month to assess decisions, service, and telephone calls. Tier 2 is conducted by the quality assurance team and involves sampling closed cases, focusing on providing assurance in relation to the Tier 1 quality control performed by operations manager. Tier 3 involves scrutiny of the organisation's quality assurance process by the Board and the Quality Committee, customer satisfaction surveys, and a senior level quality assurance exercise (where a group of senior executives and quality committee members review a small sample of cases). Tier 3 also involves a member of the organisation's Expert Panel reviewing how the organisation has handled complainants about its service. The overall focus of the framework is on monitoring trends and seeking continuous improvement.

Approach to early resolution cases

The organisation's guidance on quality assurance ratings, asks the quality team to make assessments in relation to both "primary investigation" and "detailed investigation". However, currently the work of the intake and early consideration teams is subject only to 1st tier quality control. A quality assurance framework for these teams is currently being written, because they have become essential to productivity. Some of the existing standards will apply equally to intake and early consideration, but some will need to be tailored to this area.

Approach to proportionality

Proportionality is built into several of the quality measures used by the organisation. For instance, the quality assurance process checks that decisions are proportionate to the injustice identified in a case and that the time spent on cases is proportionate to the impact that can be made by the organisation. Within Tier 1, cases that are designated high risk, systemic cases, or cases that have a high public profile are subject to high risk assurance meetings, with oversight from the Ombudsman or Deputy Ombudsmen. Within Tier 1, a minimum number of cases are assured for caseworkers who are accredited and who have delegated authority for decision making on low risk cases. This minimum number can be increased depending on current levels of performance.

Approach to case sampling

The organisation aims to draw a statistically viable sample (SVS) (this is the number of cases needed to be assured to provide confidence that the sample is reflective of the organisation-wide position). The approach to sampling aims to gather an SVS proportionate

to each aspect of the organisation's work. This sampling approach is very much about assuring the organisation that systems as a whole are working and that the 1st tier quality controls are effective; it is less suited to checking individual capability of caseworkers and managers as the sample is not big enough for that. Generally, 2nd tier quality assurance does not have the purpose of individual performance management.

Quality assurance matrix and criteria

The organisation has developed a set of Quality Standards (Qs) and Quality Measures (QMs) against which casework is assessed. The standards and measures are designed to provide assurance for three core aspects of the organisation's work: decisions; service; and process. The QMs are the high level corporate KPIs used to monitor casework quality. There are five QMs: % of evidence based decisions, with clear rationale and proportionate to the injustice we seek to remedy; % of organisations we investigate that are compliant with our SMART recommendations; % of reviews upheld annually as a proportion of our total casework; % of our final reports that meet the publishing standard; % of cases where time spent is proportionate to the impact we can make.

The Qs are divided into those relating to decisions, service, and process. Those related to process include: we are transparent about our process and how we apply it to reach our decisions and recommendations; we request evidence that is proportionate to the complaint at the right time; we follow clear guidance to deliver outcomes at the right time; we adhere to relevant legislation and policy; we keep clear and accurate records; we use feedback to continually improve our service; we spend a proportionate amount of time on a complaint to the impact we can make.

Casework is assessed as either: gold (quality standards are exceeded); green (quality standards have been fully met); amber (quality standards are partially met); red (quality standards have not been met). A detailed guidance document provides examples of how the ratings are applied in relation to each of the quality standards.

At a more granular level, every case is checked against decision standards – there are 22 decision standards of which 8 are critical. The quality assurance team mark all 22 but report on the 8 critical ones, this is to keep the focus on quality manageable for operations managers. There is scope for some flexibility and the standards considered "critical" can be amended, where necessary. If the organisation is consistently hitting critical quality targets, the standards considered critical can be varied, for example.

Quality assurance staff and resourcing

The framework is owned by the Director of Operations and Quality and implemented by the Assistant Director of Policy and Service Quality. Everyone is responsible for quality within the organisation. There are 11 people on the quality assurance team: 9 senior quality officers (SQOs) and two quality support officers. The role of the SQOs is to carry out the checks and also work on projects and other workstreams on quality to continuously improve. The job description of SQOs reflect the breadth of the job. The pay scale is on a par with that of operational managers to ensure the authority and seniority of the quality checks. Other staff are involved in quality assurance, for example, senior leadership assurance meetings involve the Ombudsman or Chief Executive and they look at cases and keep overview of what is happening, and members of the Quality Committee look at small samples of cases.

Feedback on individual cases

The framework aims to ensure that individual issues are fed back to particular caseworkers and wider lessons shared within the organisation. Feedback from Tier 1 (quality control on open cases) is provided through 121s and coaching between Operational Managers and caseworkers. The aim is to provide SMART examples of how casework could be improved and to share examples of good standard practice. Quality and Consistency Meetings are held monthly to discuss a current quality theme that requires development. Feedback from

Tier 2 is provided by quality assurance officers and/ or the Assistant Director for quality to operations managers; this also takes the form of 121s and coaching. The operations leadership team is responsible for monitoring wider issues and trends and ensuring learning and change to address any issues. There is no individual feedback to caseworkers at Tier 2 (feedback is to managers instead).

Reporting of quality assurance data

The framework is designed to provide assurance to the Ombudsman and the Quality Committee in relation to quality standards. Quality assurance outcomes are reported at various levels of frequency. Quality assurance scores are reported weekly; coaching and 121 sessions and the production of an overall quality dashboard take place monthly; a balanced scorecard is reported to the Board quarterly, with quality measures and service user feedback reported to the Quality Committee also reported quarterly. The two main KPIs reported against relate to the correctness of a decision and whether it is publishable (i.e. well communicated).

Capturing customer feedback and satisfaction

Feedback surveys are conducted both with complainants and bodies subject to investigation. This information is used as part of general quality data but is not used at case level as part of quality checks.

Use of quality assurance data for wider improvement

Feedback on quality is disseminated through a quality page on the intranet. This includes guidance and examples on what good looks like. Operational staff can book coaching and calibration sessions and can buddy with the quality team. Areas for improvement that are identified are fed into the work of the operations improvement team who take projects and system changes forward.

8.5 Scheme 5

Quality frameworks and policies overview

The organisation's approach to quality assurance is summarised in its Quality and Standards Manual, which explains the standards against which work is checked and how the checking is done. The aim of the quality and service standards is to help the organisation to meet its strategic objectives and live up to its values.

The organisation uses various methods to quality assure casework. Casework managers conduct quality checks on a sample of statements of reasons three times a year. Cases that are subject to a post-decision review are subject to quality checks. Every six months, 5% of cases are reviewed where reasonable adjustments were requested to check how the organisation responded. The intake team conducts quality monitoring twice yearly, aiming to review six cases per member of staff. Quality monitoring of assessment and investigation casework is conducted on 5% and 10% of work respectively. Only closed cases are quality assured. Generally, experienced caseworkers have delegated authority to issue decisions subject to ongoing casework decisions with their manager and retrospective quality checks.

Approach to early resolution cases

As noted above, a different sample size applies to work by the intake team, the assessment team and the investigation team. The organisation also uses a different form and scoring process for quality checks on the intake process and those on the assessment and investigation process. Generally there are a higher volume of assessment cases especially as increases in case numbers mean that there is more filtering at the assessment stage around case severity, the presence of systemic issues, and public value. There is no difference in the approach taken at assessment and investigation stages, although the former is growing in importance. The process for the intake team is different: this is essentially an online/ call centre model where cases are registered and then passed on to caseworkers. The quality checks here are closer to what you would expect in a customer service call centre.

Approach to proportionality

Although the general approach is to sample randomly, where a manager has concerns about a member of staff then more intensive quality checks can take place. Managers also check to ensure that, although drawn randomly, enough of each caseworker's work ends up in the sample.

Approach to case sampling

Overall quality checks are conducted on 10-15% of cases, a figure considered "both proportionate and manageable". For the intake team, 6 cases per intake team member are quality assured every 6 months. 5% of cases conducted by the assessment team are reviewed and 10% of cases reviewed by the investigation team are checked.

Quality checks of statements of reasons conducted by managers are made on a random sample of cases, although specific themes and selection criteria can be identified. These checks are conducted three times a year at a statement of reasons review meeting. 20 cases are sampled three times a year. They are reviewed by a panel, whose members score the cases individually and who then discuss them as a group. This is time-consuming but found to be very valuable. Individual and whole team feedback is provided on trends.

Decisions on sample size are pragmatic and based on experience around what works for the organisation. The preference for closed case sampling is based on the fact that quality assuring open cases could slow down the process and the organisation generally aims to empower caseworkers in relation to their handling of cases rather than to subject them to too many checks. Ongoing checks of live cases are left to the discretion of caseworkers and managers in one-to-ones and ongoing discussions of caseloads.

Quality assurance matrix and criteria

The organisation quality assures its casework against seven quality standards: our service is easy to access, we take full account of what people tell us and treat them with courtesy and respect; we deal with each case promptly, from first contact to final decision; the remedies we recommend are proportionate and appropriate; we exercise our discretion fairly and consistently and are transparent about the process we follow; our investigations and assessments are impartial, and we make clear, evidence-based decisions; our record keeping is accurate, and we ensure that the data we hold is kept secure and confidential; we use the outcomes of complaints to promote wider service improvement and learning.

In addition, the organisation uses quality check forms which set out more detailed criteria. The intake team quality form includes 20 criteria, which are given a numerical score (2 = met, 1 = partially met, 0 = not met). A resulting score out of 40 and a % compliance score are produced. An overall traffic light score is given as follows: green (95% compliance), amber (90% - 94.9% compliance), and under 90% (non-compliance). The quality checks on statements of reasons use a form which checks three principles (satisfying complainants; legally sound; and clear) and includes the seven standards and 13 more detailed measures against these standards. The form asks the assessor to answer "yes" or "no" with regard to whether measures have been met and to provide a qualitative commentary.

The form used to check the quality of cases that are routinely sampled or subject to post-decision reviews asks a series of questions under the headings: customer service; complaint recording; decision-making; and general comments. As an example, the questions relating to decision-making include: as the complaint properly understood; has the investigator gathered enough evidence to either (a) forward to investigation or (b) reach a reasonable conclusion on the complaint; was the conclusion reached on the complaint reasonable; were draft responses properly considered and responded to?

Quality assurance staff and resourcing

Everyone in the organisation is responsible for quality. Managers are responsible for how their teams perform, while the Professional Practice Coordinator leads work around overseeing quality across the organisation and promoting awareness of quality standards; obtaining critical feedback on quality assurance from external organisations; coordinating collection of quality monitoring data; using data to promote service improvements and influence behaviour; coordinate statement of reasons reviews. Intake team leaders quality assure their team members' work and the Customer Service Manager quality assures the Intake team leaders work. Quality checks are generally done by managers. The strengths of having quality a responsibility of managers is that quality is owned by the teams, lessons can be learned and implemented immediately, there are clear lines of accountability. The drawback is that it is additional work on top of routine management, which can be difficult to manage.

Feedback on individual cases

Feedback from the statement of reasons review meeting is provided to individual caseworkers and more general learning is also identified. Investigators get a copy of the quality form used in individual checks; each case has a quality screen that can be viewed by investigators and managers.

Reporting of quality assurance data

Reports are produced by managers against nine quality checks which are then used to provide traffic lighted overview table for the commission. These list the seven quality standards and colour code them green, amber, red.

Capturing customer feedback and satisfaction

Service complaints are investigated by line managers and a random selection are looked at by the external reviewer.

Use of quality assurance data for wider improvement

Lesson learning arises from individual checks and from the statement of reasons review and are feedback through managers.

8.6 Scheme 6

Quality frameworks and policies overview

The aim of the organisation's quality assurance documentation is to cover as many of the bases as possible while remaining light touch. The documentation has gone from being a "bible" to focusing on key principles (the current guidance is 45 pages).

Quality has developed within the organisation as it has grown. It used to deal with 100s of complaints a year. At that stage it was easier to ensure that quality checks could occur on all cases, such as sharing decisions in draft, manager oversight of all cases, and senior manager sign off at the final stage. As the organisation has grown, a more proportionate and risk-based approach has been developed.

The organisation's current approach involves two main mechanisms: casework quality advice and dip sampling. The former is conducted on open cases and involves individual members of staff having different levels of sign off authority depending on the amount of risk likely to be involved in a case. Some staff can sign off on higher risk cases, while those who are less experienced can sign-off on low risk cases but will need manager approval for higher risk cases. The guidance includes criteria guidance about how the level of risk in a case is assessed.

The aim of the dip sampling is to provide internal assurance that those cases that are not subject to casework quality advice are being dealt with properly. Dip sampling is conducted on caseworker decisions and manager decisions and approvals. Line managers, the heads of casework and the Independent Adjudicator are involved in dip sampling.

Feedback on quality and review of cases also occurs through: objections by parties to recommendations; requests to reopen a complaint; service complaints; and pre-action protocols and other judicial review correspondence.

Approach to early resolution cases

Cases are potentially subject to checking at all levels of the process. This is based on the risk profile of the case rather than when a case is closed.

Approach to proportionality

Trust is an important feature of the quality assurance system. Recruiting the right people, and giving them the right training and guidance, should mean that staff can be trusted and empowered to work independently. There is a need to recognise that not everything can be controlled and to trust staff. Quality assurance processes can end up eating up organisational resources and undermining relationships with staff and their autonomy and responsibility for quality.

Approach to case sampling

The number of cases that are subject to the casework quality advice process varies, depending on the levels of risk assigned to cases and the development points of case-handling staff at any given time, but around 15 – 20% of the organisation's cases are subject to casework quality advice before a decision is issued.

Managers are expected to dip sample 6 cases every two months, usually on cases closed during the previous month. Cases are selected from different caseworkers on a rota basis, but may be chosen flexibly and respond to circumstances. Every caseworker should expect one of their closed cases to be dip sampled every two months. Dip samplers exercise discretion in selecting cases to ensure an appropriate mix of decisions, providers, and subject matters are sampled; the sample is therefore not random.

Periodically, the casework quality group may decide to focus on a particular topic for the dip sampling to focus on.

Quality assurance matrix and criteria

The emphasis of quality assurance is trying to mitigate against unfairness in decision-making. The checks look at whether caseworkers have taken into account evidence, ignored anything relevant, whether the conclusions logical, whether evidence is properly weighed, whether the decision is clear and well communicated, whether all points of complaint have been dealt with. The checks are also concerned with consistency of approach and whether the case is decided in line with the organisation's process. The organisation places more emphasis than it did in the past on customer service to make sure they are responsive to the needs of users. Taking correct decisions is only one part of the caseworker's role. Customers are now front and centre and quality checks are also looking at tone, kindness, empathy and responsiveness.

Assessments of quality tend to be qualitative and based on a table that asks about: whether the decision was sound, fair, and proportionate; whether any areas of good practice by the provider were identified; whether the complaint was resolved at the earliest possible stage; whether the decision was explained clearly; whether a good quality service was provided; whether there are any training or development needs; whether the caseworker displayed kindness. The areas asked about are amended annually to reflect organisational priorities. A qualitative approach is generally seen as better and more reflective of the subtleties around quality.

Quality assurance staff and resourcing

Quality checks are carried out by managers and this ensures the ability to feed back to staff directly and the monitor ongoing issues. Dip sampling is done by managers but also involves the heads of casework and the head of the organisation.

Feedback on individual cases

On every single case there is individualised feedback provided by the manager. This is normally done through discussion, especially if the feedback is less straightforward or a difference of opinion on the case in question. Forms are avoided, to ensure informality and an ability to talk in a friendly way, and to ensure desired changes are achieved, but some form of e-mail feedback is usually also kept, to ensure an audit trail of advice. This ensures staff's confidence is maintained and recognises that quality often involves areas of discretion and judgment. Generally, the quality assurance is not aiming at 100% consistency; the organisation recognises that people have different styles and that there should be scope for individual freedom and approaches.

Reporting of quality assurance data

The case quality group, composed of the managers, heads of casework, head of outreach and insight, and the Independent Adjudicator, meets monthly. This will consider quality issues raised by managers and take decisions especially about cases that raise policy issues about how types of cases will be dealt with. New issues, complex issues, quality concerns, legal issues, sensitive cases – all of these are brought to the case quality group for discussion. The group looks to identify and spread good behaviours. The group can also meet on an ad hoc basis where required and sub-groups can be formed to research and develop organisational lines on new or contentious subject matters on behalf of the wider group.

Quality assurance outcomes are reported to the board but are not shared publicly. The reporting of quality outcomes is 95% qualitative. The aim of the assurance process is to assure the organisation that the process is in place and to feed back general themes.

Capturing customer feedback and satisfaction

Customer satisfaction surveys are carried out during the process and at the end. There is a strong correlation between outcome and level of satisfaction. The survey results are

considered by the case quality group and the performance sub-committee. Findings are reported monthly.

Use of quality assurance data for wider improvement

All quality outcomes are fed back to individual staff and the case quality group considers broader themes and areas for improvement.

8.7 Scheme 7

Quality frameworks and policies overview

The organisation deals with a variety of types of cases, of different values, in different sectors. The basic principle is that quality arrangements vary according to the type and value of the cases being dealt with. What is consistent across the organisation, however, is to recruit very high qualified individuals on a contracted basis. A large amount of assurance about the quality of caseworker's adjudications lies in their professional qualifications as lawyers (some of whom are very senior). They also go through an induction and mentoring process when they begin their contracts, which involves test cases and mentoring. For higher value cases in some industries, every decision will be reviewed by a more senior caseworker before being issued. For some areas of dispute there is a requirement to share findings in draft; this provides an element of external checking, as both parties can comment on a decision. There is no routine quality assurance; some dip sampling of an individual's cases may take place if concerns have been raised about their work.

Approach to early resolution cases

Approach to proportionality

As noted above, cases that are of higher value will have decisions reviewed prior to being issued and/or provide an opportunity for parties to provide comments.

Approach to case sampling

There is no set % of cases sampled on a regular basis. Dip sampling does happen on a reasonably frequent basis, however, where something anomalous in a case raises concerns. A few of an individual's cases may be looked at and that can be widened if there is evidence to substantiate concerns.

Quality assurance matrix and criteria

The organisation uses the Ombudsman Association's Caseworker Competency Framework as the basis for evaluating quality. The framework organises competency requirements under the following headings: analytical; impactful; approachable; professional; open minded; constructive.

Quality assurance staff and resourcing

Senior and lead caseworkers in the organisation are responsible for induction, mentoring, and any quality checks. This is all done in-house by a permanent staff team.

Feedback on individual cases

The feedback that individuals will get following quality checks depends on the severity of the issues, It could be being provided with support or training. If the issue is serious or repeated, the individual will simply not be given any more cases. Every caseworker has a separate contract for each case and there is no ongoing commitment by either party if things don't work out.

Reporting of quality assurance data

There are annual reports for most of the areas of dispute covered by the organisation and these include some commentary on quality.

Capturing customer feedback and satisfaction

An online satisfaction survey goes to everyone who complains. Return rates are fairly low and the level of feedback tends to be poor and largely related to case outcome.

Use of quality assurance data for wider improvement

Lead adjudicators issue directives and bulletins to case adjudicators; this can be on new types of cases, how to handle cases and sometimes about quality and style e.g. a review of 75 decisions last year resulted in giving caseworkers feedback on consistency of formatting and level of detail provided in decisions.

8.8 Scheme 8

Quality frameworks and policies overview

The quality assurance framework focuses on procedure more than on decision-making. There is a quality assurance panel composed of the Director of Investigations and 4 Senior Investigation Officers. Each quarter the quality assurance panel decides what will be the focus of the quality assurance. Caseworkers are also encouraged to assess their own cases against the framework. The findings of the process are generally positive, providing assurance to the ombudsman and identifying useful learning opportunities. While the quality assurance process might be used to follow up a performance issue, the process is generally kept separate from individual performance management. The aim is to support learning and development.

In addition to the quality assurance process there is an ongoing process whereby staff's delegated authority to sign cases off without checking is increased incrementally. There is no formal framework for this, and the approach depends on an individual's needs, experience, and capability.

Approach to early resolution cases

The basic process involves a quarterly random sample of cases at each stage of the process: initial assessment, initial investigation and final stage. The samples are larger at the initial assessment and initial investigation stage, reflecting the fact that most cases are determined at these stages.

Approach to proportionality

The quality assurance process is not undertaken by a particular member of staff, but is an add on to people's ongoing roles. Every 3 months it takes 2-3 days of the panel's time for five members of staff. Templates have been simplified to make things more objective and easier to administer. Quality assurance is now more driven by priority areas, rather than trying to cover everything in each quality assurance exercise. Generally, there are 1-2 "Rolls Royce" exercises a year and 3-4 more focused exercises that are more targeted on specific issues.

Approach to case sampling

The organisation dealt with 1211 cases last year. The organisation looks at about 10% of cases at the initial assessment stage; then would look at 20 – 40 cases at the initial investigation stage; and 8 – 10 cases at the investigation stage.

A recent focused quality assurance exercise looked at decision-making around the existence of alternative remedies and used a sample of 55 cases.

Checks are generally carried out on closed cases. Live cases are not normally part of the quality assurance checks, as that kind of checking is expected to occur as part of routine management. Quality assurance is more about identifying learning rather than checking cases before they are issued.

Quality assurance matrix and criteria

Quality checks cover four areas. File management, which looks at whether data is entered and stored correctly. Process which looks at whether procedures were followed and KPIs were met. Communication, which includes communication with the complainant, the organisation complained about, and internal communication (such as with advisers). Decision-making, which looks at the quality of the decision, its logic, rationality, proportionality and clarity of communication. Quality checks provide a binary yes/ no answer but also allow for qualitative commentary. The yes/ no answers are then reported as a % and within red, amber, and green categories.

Quality assurance staff and resourcing

The organisation as a whole has 62 members of staff. As noted above the director and four Senior Investigation Officers are part of the quality assurance panel and they carry out the checks. The organisation would like to have someone whose role is dedicated to quality as currently quality can become a victim of other pressing business. The quality assurance panel's approach however is helpful as there is a lot of experience on the panel and results of the quality assurance can be fed back directly into improvements. On the other hand, having a dedicated member of staff somewhat removed from the management structure could lead to robust questioning and not working from assumptions.

Feedback on individual cases

The quality assurance panel produces a report that gives generic feedback rather than looking at individual cases. People don't see the quality assurance template on their own case and where there is an issue that is fed back to the individual by the director.

Reporting of quality assurance data

The quality assurance data is reported in % terms against RAG categories. It is broken down into stages and categories. There is also an overall qualitative report drawing out the themes. There is no KPI/ target for quality –that is something that might be looked at in future. Quality assurance results are not currently reported publicly. The organisation is currently setting up an advisory board that will have a role in reviewing reports on quality.

Capturing customer feedback and satisfaction

The organisation has just completed its first customer satisfaction survey and the aim is to carry one out every two years. The organisation also gets feedback from the service complaints process and when people ask for reviews of decisions.

Use of quality assurance data for wider improvement

The quarterly audits are used directly by the quality assurance panel to engage in improvements, where they are identified. At the conclusion of any quality assurance report (whether focused on one area or covering all aspects), the organisation produces an action plan. This plan recommends any staff training, process changes, literature changes etc, and is then agreed with by the senior management team and implemented before the next round of quality assurance begins

8.9 Scheme 9

Quality frameworks and policies overview

The quality framework is broken down into different areas of the business

- Investigation
- Decision quality framework.
- Customer connect quality framework (relates to the customer call hub)
- Service complaints quality framework
- Social media quality framework

Each framework is designed to provide assurance to the executive, the board, and the organisation's stakeholders. Currently the framework focuses on "quality assurance" – where a check is conducted after the activity has concluded– but the organisation is now working on introducing "quality control" where any issues are identified and fixed before the activity concludes. New staff spend six months in a training academy (where their work is closely supervised), after which they enter the quality assurance framework and become subject to checks.

In addition to routine quality checks, the organisation conducts quarterly deep dives. These respond to areas where a risk has been identified. Every quarter a number of issues are identified and about 12/ 15 deep dives are conducted every year.

The approach to quality aims to be positive and about working with people and having constructive conversations about making things better. The organisation aims to identify systematic issues rather than individual issues, which are dealt with under the organisation's performance management framework. While individual issues may be picked up that is not purpose of the framework, although this may be revisited as part of the new Target Operating Model.

Approach to early resolution cases and quality framework roll out

There has been a significant extension of the coverage of the quality framework from June 2021 onwards. Pre-2021, quality checks concentrated on case set-up and investigation. Between July and November 2021, this was expanded to cover final decisions. Post October 2022, new areas covered in the quality assurance framework include the work of the customer call hub, social media team, triage activities, and service complaints. The organisation has therefore expanded its focus to ensure the quality assurance process covers all aspects of the organisation's work.

Approach to proportionality

The framework aims to be risk-based and identifies key risk areas that are priorities and particularly high risk for routine checking. For example, there are 12 priority risk areas for investigation work (and more for final decisions). In addition, as noted above, deep dives occur so that the organisation can respond flexibly to any other identified risks as they arise and are identified.

Approach to case sampling

The quality assurance framework focuses on providing assurance in relation to concluded activities. Whether a particular activity has concluded is the trigger for quality assurance rather than whether a case is closed. As a result, the quality assurance process considers both open and closed cases. Quality assurance checks occur a week after a particular activity has been concluded to ensure that any action needed to fix a problem won't cause too much detriment to the parties. Ongoing quality control mechanisms exist within teams to ensure that cases that need to be checked before closure, are checked

From April 2023, quality checks on investigations will involve a 5% random sample of cases. Ombudsman Leaders check two cases per month, resulting in Ombudsman Managers having one of their cases checked per quarter. 1 in 33 decisions of Associate Ombudsman a month and there is one check per Decision Ombudsman per month. This

amount of sampling is based on what is required for a statistically representative sample. The organisation is confident that this is a sufficient number and experience is showing that it is able to identify areas for improvement.

The work of the customer call centre involves business as usual checking on 1 in every 73 calls per person in relation to inbound calls. Checks on case set up occur on every 40th conversion per call handler.

Quality checks on responses to service complaints occur on every 15th final service complaint responses. Checks are allocated once a fortnight and completed within 10 working days.

Checks on social media replies involve 21 quality checks completed weekly, with the starting point being an equal amount per assistant per week.

The quality team performs check the checker checks on around 250 technical checks per quarter. From April 2023, the quality team will be completing 150 process checks per quarter per directorate.

Quality assurance matrix and criteria

Strategic quality metrics (KPIs) align with key customer, quality and service expectations throughout the case journey. Standardised quality checklists are used. Each check involves a yes/ no answer to help drive consistency; a no response to any question results in 0 score for a section. Cases are given the following ratings: 95%+ meets the required standard, 94.99% - 85% opportunities for improvement, less than 85% does not meet required standard. The investigation quality assurance checklist has 12 binary questions and three text boxes where qualitative feedback can be provided.

Investigation checks cover jurisdiction, approach, view, outcome. Decision checks cover customer service, jurisdiction, approach, decision and outcome. Call centre checks look at the quality of telephone calls and include looking at the start of the enquiry, customer service, progressing the enquiry, basic data and end of the enquiry. Case set up checks look at basic data, searches, data, complaint data, customer requirements, operational warnings, customer service, declaration. Service complaint checks involve service complaint data, service complaint SLAs, response, and outcome.

Quality assurance staff and resourcing

There is a central quality team. There are 11 quality assurance advisers, partnered with each area of the business. One of the quality check principles is that the person carrying out quality checks on a case should be independent of the person whose work is being checked. The quality team is responsible for training individuals conducting quality checks.

The central quality team quality assures the process, while assurance with regard to the technical correctness of decisions are conducted by approved checkers within pods (typically ombudsman and more senior staff). The organisation has recently moved from resourcing with Quality Team with secondees from the operation to permanent roles. There is also a desire for individuals in the team to see quality as a discrete and valuable career trajectory. Some quality assurance staff are undertaking Chartered Institute for Quality training.

Feedback on individual cases

Individuals can access their individual quality assurance scores through a dashboard and feedback on individual cases is provided through SharePoint forms. Once a check is done the line manager and the caseworker are notified and they both see the feedback. The manager can support and coach the individual as necessary.

Reporting of quality assurance data

Quarterly feedback reports are produced by the quality team for each pod/ area. There is also daily reporting through an online dashboard. The data is broken down for each team. For investigation checks, an overall score is given for jurisdiction, view, outcome and

approach and more detailed scores are available for specific questions beneath this. The quality dashboard also includes other quality metrics such as customer satisfaction, the rate of ombudsman referrals, and decision return rate. Action logs for serious failings are monitored by quality team. Every other month a cross service quality review meeting is held. Every quarter the quality committee, attended by the executive and non-executive directors, considers the quality outcomes. Quality scores are also reported publicly.

Capturing customer feedback and satisfaction

There is a separate team collecting data on customer experience. They have data that is used as part of overall assessment of quality. The organisation will shortly be moving to a balanced scorecard approach which incorporates quality scores, customer satisfaction complaints, service complaints at team and individual levels.

Use of quality assurance data for wider improvement

As noted above the organisation has a range of mechanisms for identifying opportunities to learn both from business as usual checks and deep dives. The quality assurance team closely monitors quality outcomes and feeds these back to managers and within the organisation's governance structure.

8.10 Scheme 10

Quality frameworks and policies overview

The organisation uses a range of mechanisms to ensure quality, including: recruiting qualified staff and having a probation period to ensure competence; using standards processes and providing guidance to caseworkers; monitoring performance statistics and ensuring regular one-to-ones between managers and caseworkers; and quality checks. All adjudications are approved by the Lead Ombudsman or the Deputy Chief Ombudsman before being issued. The organisation is currently reviewing various aspects of its quality arrangements and this is a work in progress.

Approach to early resolution cases

The organisation had to cope with an increased pipeline as a result of Covid and created a new triage team. This is responsible for carrying out initial checks and also conciliations. Only cases that cannot be conciliated are passed on to the ombudsman team for adjudication. The current quality check process for the triage team is a variation of the quality process for the Ombudsman team and a more bespoke version is currently being developed.

Approach to proportionality

We Quality Check all complaints and any cases with elements that are deemed higher risk - there are no criteria outlining what this means in practice but it is considered on a case by case basis, for example within our complaints clinics

Approach to case sampling

5% of closed cases are randomly sampled, this amounts to about 40 cases being checked per month. The 5% figure is a contractual obligation for running one of the dispute resolution schemes run by the organisation. In addition, 10 cases per quarter are reviewed and discussed by the organisation's Standards Board.

The organisation operates a service complaints procedure. This has two stages: Stage 1 involves a review by the caseworker responsible for the case; Stage 2 is carried out by the lead ombudsman. All files subject to a Stage 2 complaint are subject to a quality check.

The organisation is considering introducing some checking of live cases on a small proportion of cases. This would allow issues to be picked up at the time rather than fixed retrospectively.

Quality assurance matrix and criteria

The Standards Board uses the Ombudsman Association's Service Standards to assess quality: accessibility, communication, professionalism, fairness and transparency. A form setting out the standards and allowing for a qualitative assessment of the case is used by Standards Board members and the results are discussed at quarterly meetings.

A quality assurance spreadsheet is used to perform the main quality assurance checks. The form provides the opportunity to provide a numerical score against each question (usually out of 4, but for some questions out of 2). Cases are scored out of 68 and a final percentage is produced. There is no official target but the organisation would generally hope to see scores above 80%.

There is also the possibility of recording an "instant fail" against any question. An instant fail is recorded for: not logging phone calls, not adhering to service level agreements in terms of response times, failing to fully explain the decision to both parties, not correctly labelling attachments/documents, data security breaches

Quality assurance staff and resourcing

The quality checks in the 5% random sample are conducted by the Chair of the Board, a practising Trading Standards Professional. This is to enhance the legitimacy and independence of the quality process.

The Standards Board reviews a cross-section of adjudications, and is responsible for overseeing rules, practices and procedures. The Standards Board is composed of a mix of academics, trading standard officers, consumer representatives, and businesses.

Feedback on individual cases

Staff are provided with copies of completed quality check spreadsheets. Problematic issues are dealt with in one-to-ones by line managers. The quality checks process is designed both to support individual performance management and organisational improvement.

Reporting of quality assurance data

A quarterly quality report is produced which records: number of cases closed; service complaints received; number of quality checks (inc. top score, range, median, and number of fails); key themes; key actions. The report goes to the Standards Board. Any suggested improvements will be discussed by the Deputy Chief Ombudsman, the Head of Process, Quality and Risk and the Lead Ombudsman. Trends in quality scores are monitored to ensure continuous learning.

Capturing customer feedback and satisfaction

A service complaint process allows for individual to challenge a decision and processes followed by the caseworker. Complaints are reviewed and responses provided by a Lead Ombudsman. Customers can provide ad hoc feedback, but are not systematically surveyed.

Use of quality assurance data for wider improvement

This is identified through quarterly reporting and senior management action, as noted above.

8.11 Scheme 11

Quality frameworks and policies overview

The Customer Journey Quality Framework is based on a Governance, Assurance and Improvement approach. Governance ensures that the requirements of the organisation are reflected in the operational frameworks, policies, processes and plans and that they meet with stakeholder requirements. Assurance embeds the principles of assurance to ensure that policies, processes and plan are effectively implemented and that all outcomes are consistent with requirements. Improvement ensures that the organisation is learning from experience, not just as individuals but as an organisation.

Approach to early resolution cases

Although underlying processes are different in each area, to reflect the nature of their work, the principles and approach to quality assurance remain the same across the organisation and there is a common quality framework across all areas. There are tailored scoring documents for each part of the service.

Approach to proportionality

The organisation carries out quality checks at different points in the customer journey and with different frequencies depending on their outputs. The organisation will also consider operating a risk-based approach where possible and carry out increased checking where the potential for error or misunderstanding may be higher – for example, in relation to new recruits or new, emerging areas of the organisation including changes to processes, or at the request of a team manager.

Approach to case sampling

Quality assurance checks are carried out on phone calls and cases, with checks tailored to the kind of work being carried out and the stage of the complaint journey. Checks are conducted at key milestones, for example when a case moves between stages of the customer journey or to and back from legal. 10% of each team's cases are sampled. This figure was chosen based on straw poll of what other ombud schemes were doing at the time. Cases are sampled randomly from a list of case reference numbers. However, while the cases are picked at random, the sampling ensures that within each team, each person's work is subject to quality checks.

Quality assurance matrix and criteria

A checklist is used with a number of questions which ask whether key actions have been completed at each stage of the process. The questions focus on process, service, and communication (rather than the substance of decisions). Each team has its own specific checklist. Some staff use these to make sure that they have completed all actions on a case. A score is given for each question: green (good customer experience). 100 for "pass with excellence" and 85 for "some minor areas for development" (e.g. typos); amber for needs improvement – 79 two areas for development, 65 three areas for development, 51 four or more areas for development; red – 40 did not meet expectations, resulting in negative impact on customer. The results, and any feedback, is provided directly to members of staff each week. The organisation aims to have a quality assurance score of over 85%.

The organisation does not quality assure decisions reached by caseworkers. Decisions are subject instead to quality control mechanisms. If a complainant disagrees with proposals to resolve a case at early resolution, they can request for a case to go to adjudication. All opinions that are subsequently issued by adjudicators are checked by an Opinion Review Group. Any individual who is not happy with an opinion can ask for the ombudsman to determine the case. The ombudsman's decisions are subject to appeal on a point of a law.

Quality assurance staff and resourcing

The executive team is responsible for setting priorities and broad oversight. Strategic leads are responsible for setting the quality definition and principles and providing leadership and ensuring compliance with the Customer Journey Quality Framework. The Customer Service Manager creates a quarterly quality report, takes forward improvements, provides coaching to the Quality Assurance Team Manager. The Quality Assurance Team Manager oversees day to day management of the Customer Journey Quality Framework. A Quality Delivery Group (Chaired by Customer Service Manager and composed of the Quality Assurance Team Manager and Operational Team Managers) meets periodically to discuss quality issues, potential improvement, and developments. There are around 160 members of staff in the organisation. The quality assurance team is composed of a Quality Assurance Manager and 3 quality assurance officers. Whilst the team sit within the Casework area, having a separate team allows checks to be independent and for trends and issues to be spotted in a way that line managers might not be able to. Because the quality assurance team focuses on customer interactions and service, the team do not need to have expert knowledge of the substantive casework issues. They will however look to check whether a caseworkers had all required evidence to take decision.

Feedback on individual cases

Immediate feedback is provided on cases to help capture development areas, learning points and best practice.

Reporting of quality assurance data

The results of the quality audits are considered alongside the responses to customer satisfaction surveys, the service complaints that have been received, feedback from the opinion review group and the ombudsman to provide an overall picture of the quality of the service. A quarterly report is provided to the executive team and a monthly summary to the Customer Journey Delivery Group. Data allows trends to be identified and improvements made. The organisation is currently developing a quality dashboard to make it easier to report and track quality data.

Capturing customer feedback and satisfaction

Customer satisfaction is collected at three stages (application, early resolution, adjudication). Interpreting customer satisfaction data is challenging given the influence of the outcome on the result. The organisation's focus is on using the data to highlight trends rather than focusing on the absolute satisfaction scores. The customer satisfaction data is separate from individual case checking. Customer feedback is used along with quality assurance data, service complaints data and feedback from the Opinion Review group and the Ombudsman as a form of triangulation to provide overall assurance about the organisation's work.

Use of quality assurance data for wider improvement

Trends and themes are collated through quality assurance audits, service complaints that have been received, and the customer satisfaction survey results. These are discussed Customer Journey Delivery Group and passed to the relevant team to drive ideas / changes forward to improve the overall customer journey. The executive team considers strategic escalations where there are business changes or risks that have been identified and need to be considered as part of the overall business plan.