

Management Board - for assurance

Meeting agenda title: ICS customer satisfaction research

Meeting date: 21 March 2022

Time required: 15 minutes

Presenter: Suzanne Gordon, Director of Public Advice & Data
Protection Complaints

Approved by: Paul Arnold

1. Objective and recommendation

- 1.1. The objective of this paper is to provide Management Board with an opportunity to hear and discuss the ICS (Institute of Customer Service) customer satisfaction survey results for our frontline services. Providing assurance that our continuous improvement actions planned for 2022/23 will deliver improvements across these services, ahead of the next survey in February 2023.

2. History and dependencies

- 2.1. In 2021 the ICO joined the ICS to help support and strengthen our work and commitment to improving customer experience when accessing a service at the ICO. We have joined the ICS initially for five years and as part of this membership, we can access up to three customer benchmarking surveys a year and be benchmarked against other ICS members, both at a Public Sector (National) level and also against the totality of the 400+ members, ranging from private, to public and third sector organisations (including a number of regulators). The benchmarking results are published each July and January.
- 2.2. Our first customer satisfaction benchmarking survey ran from 14 Dec 2021 – 11 January 2022. In this 28 day period, ICS sent an email survey to around 2000 ICO customers who had accessed a service/s during the previous 8 weeks in Business Services, Public Advice & Data Protection Complaints (PADPC), FOI Casework, Information Access and ICO Regions.
- 2.3. 250 customer responded (13%) which the ICS reported was a very healthy level of engaged, as industry average is 10%. 56% of the responses were from members of the public and 44% of the responses were from our business customers. 95% of the

responses were from customers who had accessed services from PADPC or Business Services. Whilst we ran a separate survey for Welsh speakers, we did not receive any survey results.

3. Survey headlines

- 3.1 Our baseline Customer Satisfaction Index score (CSI) is 69.4. This is on par with HMRC who have also scored 69.4 and DWP (Job Centre plus) who scored 70.
- 3.2 Our business CSI is 80.7 and public satisfaction is 60.6. ICS reported that 69.4 is a respectable baseline score and its only 0.6 of a point away from meeting the criteria to apply for the ICS ServMark Accreditation.
- 3.3 We scored highest for customer experience at 70.5 and lowest for complaint handling at 26. The definition for complaint handling is where a customer has had a bad experience with the ICO over the last 3 months (so it's not necessarily a formal service complaints).
- 3.4 We obtained a NPS (Net Promoter Score) of +10. This is lower than the Public Sector National Average of +28, but higher than comparable organisations such as Companies House and DWP (Job Centre plus) and HMRC who have negative scores.
- 3.5 We scored 5.1 (lower is better) on the customer effort question. This is a strong score and puts us in the top 3 Public Service National organisations for how easy customers find it to do business with us.
- 3.6 The ICS reported that there is a direct correlation between getting it right first time and a high satisfaction score. We scored 52.4 on this question compared with an average score of 79.8 across UK All sector average.
- 3.7 Under the category 'Satisfaction by Channel', we scored 78.8 for contact by telephone, outperforming the average Public Sector National score of 71. We are on par with the average score for contact via website, but scored lower than average for contact by email, scoring 60 against an average of 70.
- 3.8 Trust is 81.9 for business customers and 58 for members of the public, with an average trust score of 69. Linked to trust and satisfaction, a high proportion of narrative feedback from the public is related to dissatisfaction that we haven't taken regulatory action linked to their individual complaint.

3.9 Deep dive into the complaints score

To give the complaint handling score more context:

- 72 customers out of the 250 surveyed said they had had a bad experience with the ICO over the last 3 months.
- Out of the 72, 52 were members of the public and 20 were businesses.
- Of the 72 customers, 52 customers told us about their problem.
- Of the 72, 37 cases were related to members of the public raising a data breach or complaint about DP/PECR, 6 were linked to businesses reporting a data breach, 6 were related to business advice and 5 linked to public advice.
- The score of 26 is derived from the combined scores related to complaint outcome, complaint handling, timeliness and attitude of staff dealing with the customers problem.
- Overall, customers who had a bad experience scored us 36.8 on the overall CSI.

3.10 Noteworthy insight about customer experience in Public Advice & Data Protection Complaints Services:

- When contacted for advice via live services (telephony and live chat), members of the public rated the service they received as a CSI of 76.4, with helpfulness of staff at 79.1 and competency of staff scoring 80.8. Most commonly used words to describe these services were 'informed', 'helpful' and 'reassured'.
- When contacted for advice via email, we scored 100 in ease of access.
- When dealing with DP complaints by email and in writing our scores reduced to a CSI score of 53.5, with helpfulness of staff scoring 53 and competence of staff 56. However when we spoke to the customer on the telephone about their data protection complaints, satisfaction rose significantly to 79, with helpfulness of staff 88 and competence scoring 93.

3.11 Noteworthy insight about customer experience in Business Services:

- When dealing with enquiries over live services (telephony and live chat), business customers scored us 84.3, with helpfulness and competence of staff scoring 88 and ease of access 87.
- When dealing with customer via email, we scored was 77, with helpfulness and competence of staff a strong 80.4.

- 3.12 Whilst there is some fluctuation in scores, what is noticeable is the overall high scores our staff received around helpfulness and competence, especially when ICO staff speak to our customers. We also scored highly around ease of access, reflecting our customers' ability to interact with the ICO in the way they prefer.
- 3.13 Whilst the complaints handling score is lower than one would hope, ICS explained that they have comparable regulatory organisations as members who regularly score in the 40's for complaint handling, so there may be some value in further exploring the right benchmark for the ICO whilst also striving for the highest possible scores in this area.

4. Improving the ICO customer experience over the next 12 months

- 4.1 The ICS survey results provide a robust baseline to help shape our continuous improvement activities focused on improving the customer experience by 2023. Feedback from the ICS suggests that by using the survey insight to inform our continuous improvement plans, we can increase overall customer satisfaction by +3 points to 72.4 by February 2023.
- 4.2 To achieve an overall CSI of 72.4 by February 2023, we would be aiming for an increase of +3.6% in satisfaction from customers accessing our public services and a maintenance target for our Business Services given the high level of baseline satisfaction. However, if we wish to take an ambitious approach around Business Services, the ICS has suggested aiming for a 1% increase which would take the score from 80.6 to 81.6.
- 4.3 For the purposes of this paper we have focused our continuous improvement reporting on the two largest customer service directorates (PADPC and Business Services), both of which collectively generated over 95% of the survey results. However it is worth noting that other directorates that took part in the survey (including FOI and Information Access) have similarly focused Business Plans for 2022/23, around improving timeliness and quality of service.
- 4.4 A summary of our areas of focus for the coming year are contained below.

4.5 Public Advice & Data Protection Complaints

Improve how we better manage the customer expectation

- 4.5.1 When accessing the DP complaints services, some of our survey respondents used phrases such as 'pointless', 'frustrating', 'disappointing', 'ICO has no teeth'. 'why no regulatory action when there's a clear breach'. Whilst our website and literature explains our compliance improvement focus and largely educational role when considering individual data protection complaints; there is clearly more that we can do by increasing our use of reprimands (to better demonstrate regulatory action) and publishing more of the stories about the impact of our work to aid good practice amongst data controllers and demonstrate to the public the difference our work makes.
- 4.5.2 Much of our workplan for next year focuses on this, and work is already in train for using reprimands more routinely in our complaints work and publishing our impact stories, starting with our work to improve subject access compliance which we will be publishing in April. In addition, we also have plans to develop easy to understand videos and FAQ's for the website to sit alongside the ICO Chatbot as this tool is rolled out for PADPC queries, along with a review of the online DP customer journey.

Getting it right first time

- 4.5.3 As the ICS survey results points out, there is a clear relationship between getting it right first time and high levels of satisfaction. The survey data shows a clear link between satisfaction levels falling when customers have to chase for answers or have to contact us multiple times to find the information they need. For this reason we plan to continue our timeliness focus aimed at achieving our stretch casework target of 80% of DP complaints closed within 3 months by September 2022. In addition to this, we will be rolling out a new Quality Assurance Framework in April, which we have developed and piloted this year and to strengthen our approach to training, we will be rolling out training to accompany our training manual, so we can be clear and consistent about what we expect of our people both from a quality and customer service perspective.

Personalising our casework approach

- 4.5.4 It's clear from the survey results that we need to improve how we listen to our customers and demonstrate to them that we are being impartial in our assessments. By using introductory telephone calls more routinely in our casework, we will build trust with our customers, improve our overall understanding of their concerns, better manage their expectations and explain our approach and role at the beginning of the case. By taking this approach, we should see overall satisfaction increase, even when the customer is not satisfied with the outcome.
- 4.5.5 We have also reflected that we may now be relying too much on heavily template letters. Whilst they can drive efficiency in high volume, transactional correspondence, they can feel impersonal and automated. Part of the challenge here will be giving our people the confidence to more fully personalise / tailor their written correspondence whilst maintaining our corporate narrative.

Improve the overall experience for customers when they raise a bad experience with the ICO

- 4.5.6 Our lowest scoring area of the survey is complaints handling at 26. Whilst this score is related to complaints being received across all of our front line services, it's right to recognise that a larger proportion of customers accessing our public services complain about an outcome and/or their experience compared with business customers. Therefore it is absolutely right that one of the priority areas for PADPC focus is on improving the customer experience when things go wrong.
- 4.5.7 Over the last 6 months we have been concentrating efforts on improving the timeliness of service complaints and we are now dealing with around 90% of complaints within our 30 day target. Further work is now underway to establish a Customer Excellence Network of Team Managers and Lead Case Officers who will impartially reconsider outcomes and be that 'fresh pair of eyes' when considering service complaints and/or case reviews. They will telephone customers who raise a complaint to introduce themselves, listen and discuss concerns and explain what they will do to look into the complaint and when the customer will receive a response. They will work together to identify process improvements and any emerging themes, make recommendations that we can collectively act upon. The Network will share best practice across

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the directorate and will survey case review and service review customers in line with the ICS complaint categories, so we can measure incremental improvements ahead of our next ISC survey in February 2023. All learning from this experiment will also be shared with the wider office via the Customer Experience Group, so to ensure that we are taking an office wide best practice approach to responding to any service complaints.

- 4.5.8 The Network members will be our 'Customer Experience Ambassadors' and will very much lead by example and help us find ways to embed a 'customer first' approach across the directorate. This will hopefully tie in well with the QA framework set to be launched in April.
- 4.5.9 By taking this approach, we will aim to improve the complaints handling score by +5 points by February 2023.

4.6 Business Services

- 4.6.1 With an overall average of 80.7, our services for businesses are outperforming nine of the ICS' 13 sectors and we're on par with the tenth. But we're not yet reaching the scores of the top 50 individual organisations (the current number 50 is at 81.8) and that's our aim for the next survey.
- 4.6.2 Because Business Services offers a number of distinct services to businesses performed by different teams, there's more to be gained by analysing the scores of our individual service areas than pulling out themes from our overall results.

Advice giving

- 4.6.3 Our average score for advice giving was 82.5 with an average effort score of 4.1 out of 10 (for effort, lower is better). We dropped to 73 when asked whether respondents would be likely to 'use another ICO service' (most respondents put 'not applicable' here) but rose to 88 for 'intention to stay as an ICO customer'.
- 4.6.4 Respondents described their experience as 'helpful', 'reassured', 'satisfied' and 'confident' but 'frustrated' also featured. From their additional comments, customers would appreciate more certainty in some of our answers and for us to have a better understanding of how data protection applies in the 'real world'. This is similar to insight we received earlier this financial year that we are already acting on.

Personal data breach handling

4.6.5 Our average score for personal data breach handling was 82.1 with an average effort score of 4.4. Scores dropped to 76 for 'the ICO designs the experience around its customers' and rose to 86 for both 'the ICO does the right thing in business practice' and the 'ability to interact with ICO in the way you prefer'. The most commonly used words about breach reporting were 'informed', 'satisfied', 'reassured' and 'relieved'. Again 'frustrated' featured, but as associated supporting suggestions included 'train staff to better communicate with complainants', this suggests there may have been some mis-categorisation of complaints as breach reports.

DP fees and registration changes

4.6.6 The overall average score for DP Fees and registration contacts was a little higher than the others at 85.7. Average effort score was also higher at 4.8. Scores dropped to 78 for 'billing and invoicing' and rose to 94 for 'helpfulness of staff'. The most commonly used words about the DP Fees Service were 'informed', 'satisfied', 'helpful' and 'efficient', which clearly reflects the very high score we got for 'helpfulness of staff'.

4.6.7 We had fewer surveys about our DP Fees service than we did about advice requests and breach reporting. This was surprising as it is Business Services' busiest service.

EDI considerations

4.7 EDI considerations have been in the forefront of our mind whilst reviewing the ICS survey results and considering how this informs our business plan priorities and continuous improvement plan. PEIA's will be required for much of these workstreams and will be undertaken at individual project level.

Risks

4.8 By introducing this baseline ICS customer satisfaction score, we are now able to run cycles of evaluation, analysis, activity and re-evaluation. This approach will help to develop and create a sustained customer excellence culture, and thus will positively impact the ICO *Corporate Opportunity 02 Service Excellence: To better understand customer and stakeholder needs and create aspiring leadership and staff engagement to build a service*

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excellence culture resulting in an improved, reliable and responsive customer service, enabling the ICO to better deliver all of its IRSP goals, improve public perception and provide excellent public service as a regulator.

Consultation done or needed

- 4.9 We have now shared the results of the ICS survey with Trade Unions. One particular area of interest from a TU perspective was the question we asked about our live services opening times. Given that 70.4% of respondents were happy with the Monday – Friday 9am – 5pm opening hours, and we scored highly on ease and choice of access, we do not intend to propose any changes to live services opening times at this stage. We will however keep this under review and may ask some additional qualitative questions in the next survey.

Conclusion

- 4.10 The ICS customer survey has provided a strong baseline score that we can now benchmark against and use to focus our efforts on improving ICO customer experience, our impact and reputation. Whilst there is work to be done to improve our results, we should celebrate in particular the fantastic scores we received for staff helpfulness, competence and for ease and choice of access.
- 4.11 Informed by the survey results, work is now underway to improve the customer experience, with an aim to increase the ICO's overall CSI score by February 2023 to 72.4.

5 Areas for challenge

- 5.1 By delivering the actions outlines in section 4 above, we believe that by February 2023 we should achieve a 3 point overall increase in our CSI score (with a +3.6 point increase in our public service satisfaction and a +1 point increase in business service satisfaction), taking us to 72.4.
- 5.2 We welcome feedback and challenge from Management Board on the survey results, proposed target and areas of focus for 2022.

6 Communications considerations

- 6.1 The survey results have now been shared with ET, Directors and Head of Service and our Trade Unions. The results have also been presented at both the Regulatory Delivery Board and the

Communication Engagement Board for visibility and discussion. The next phase of communication is to share the details of the survey with the wider office during March.

7 Next steps

7.1 The next steps for this work are:

- Delivery of the action plans as part of 2022/23 business plans and were we can use 'mini' surveys to measure incremental improvements ahead of the next survey in February 2023
- Sharing best practice through the ICS network. ICS has partnered us with HMRC and GMC to learn best practice, as both have been on this journey with similar current / baseline scores, albeit they have been a member of the ICS for a number of years now
- We will continue to collaborate with colleagues as part of the Customer Experience Group to explore any ICO wide learning and initiatives.

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List of Annexes:

Annex 1 – ICS Customer Satisfaction Survey results

Publication decision: This paper can be published internally and externally without redaction

Outcome reached: