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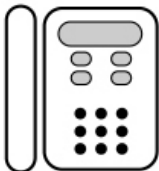
***Direct Investigation on Effectiveness of
the Integrated Call Centre in Handling Complaints***

The executive summary of the investigation report is at **Annex A**.



Anonymised Investigation Report

A summary of an anonymised investigation report on complaint against the Hong Kong Examinations and Assessment Authority is at **Annex B**.



Enquiries

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**Office of The Ombudsman, Hong Kong
26 June 2008**

EXECUTIVE SUMMARY

Direct Investigation on Effectiveness of the Integrated Call Centre in Handling Complaints

Background

The Integrated Call Centre (“ICC”), managed and supervised by the Efficiency Unit (“EU”), was set up in July 2001 to provide a round-the-clock single point of contact for citizens to make enquiries, lodge complaints and make suggestions about services of Government departments participating in the ICC service. The ultimate aim is to replace the myriad of departmental hotlines, fax numbers and email addresses with a Citizen’s Easy Link 1823.

2. Since our direct investigation into its overall operation in 2003, ICC has taken on new responsibilities and extended service to cover 20 departments with a total of 104 hotlines, fax lines and emails (**Annex 1**). Meanwhile, The Ombudsman has continued to receive complaints about ICC service, particularly its handling of complaints. Many of them have come about despite ICC agents (staff handling calls) complying with the relevant rules and procedures.

The Investigation

3. Concerned that such complaints suggest new or continuing systemic deficiencies in ICC’s arrangements, The Ombudsman initiated a direct investigation under Section 7(1)(a)(ii) of The Ombudsman Ordinance, Cap 397, on 20 June 2007 to examine:

- (a) the role of ICC in handling public complaints¹;
- (b) the procedures and practices for –
 - (i) referring complaints to the responsible Government departments;
 - (ii) coordinating and monitoring responses of departments to complaints;

¹ Unless otherwise specified, references to “complaint” hereafter mean complaints against public services provided by Government departments.

- (iii) following up, particularly when multiple departments are involved;
 - (iv) keeping complainants informed of progress in the interim; and
 - (v) giving complainants a final reply;
- (c) the adequacy and effectiveness of the current *modus operandi*; and
- (d) areas, if any, for improvement.

4. We visited ICC and held meetings with EU and ICC at working and senior management levels. We examined over 100 complaint cases and studied ICC's agreements with client departments, operation manuals, statistics and working files.

Service Coverage

5. ICC service covers some but not all aspects/ issues of living in Hong Kong. Currently, ten of its client departments are directly related to environmental hazards and cleanliness – two subject areas targeted by EU at ICC's inception. ICC also serves other departments on a need basis (see **para. 25** for the specified hot topics).

6. Telephone made up 99% of the enquiries and 90% of the complaints received in 2007. ICC currently handles two types of calls: (a) calls made to 1823 direct; and (b) calls made to hotlines of participating departments. Despite ICC's goal of replacing departmental hotlines with 1823, the two still co-exist and remain so with all the participating departments.

7. Apart from telephone calls, ICC handles emails for five of its client departments and faxes for two. In addition, ICC keeps a full register of complaints received through all channels for three client departments (**Fig. 1**).

Fig. 1 List of ICC clients and ICC's service coverage

	Department	Hotline	Email	Fax	Central Repository
1.	Agriculture, Fisheries and Conservation	•			
2.	Architectural Services	•			
3.	Buildings	•			
4.	Civil Engineering and Development	•			
5.	Companies Registry	•			
6.	Drainage Services	•			
7.	Electrical and Mechanical Services	•			
8.	Food and Environmental Hygiene	•	•		
9.	Highways	•	•	•	•
10.	Labour	•			
11.	Land Registry	•			
12.	Leisure and Cultural Services	•	•		•
13.	Marine	•			
14.	Office of the Government Chief Information Officer	•	•		
15.	Post Office	•			
16.	Rating and Valuation	•			
17.	Student Financial Assistance Agency	•			
18.	Social Welfare	•			
19.	Tobacco Control Office, Department of Health	•			
20.	Transport	•	•	•	•

Statistics

8. ICC classifies incoming communications into four categories: enquiries², complaints³, suggestions⁴ and compliments. Complaints make up about one-tenth of all cases answered by ICC.

9. Over the period from 2004 to 2007, the proportion of complaints through 1823 each year has remained more or less the same, making up roughly one-third of all complaints answered annually (**Fig. 2**). This contrasts with enquiries made through 1823, which have grown in proportion from one-fifth of all enquiries in 2004 to one-third of all enquiries in 2007.

Fig. 2 Monthly average number of the types of cases and their lines of call answered by ICC

Case Type	Line called	2004 (% of total)	2005 (% of total)	2006 (% of total)	2007 (% of total)
Complaints	1823	4,238 (4%)	6,625 (4%)	6,795 (3%)	7,647 (3%)
	Departmental Hotlines	9,946 (8%)	8,431 (5%)	11,191 (5%)	12,477 (6%)
	Ratio (1823 : total complaints)	1 : 3	1 : 2.3	1 : 2.6	1 : 2.6
Enquiries	1823	20,067 (17%)	33,414 (18%)	61,939 (28%)	77,072 (33%)
	Departmental Hotlines	78,659 (67%)	128,617 (71%)	134,329 (61%)	125,749 (54%)
	Ratio (1823 : total enquiries)	1 : 4.9	1 : 4.8	1 : 3.2	1 : 2.6
Others	1823	2,127 (2%)	2,718 (1%)	4,352 (2%)	4,874 (2%)
	Departmental Hotlines	2,969 (2%)	2,724 (1%)	2,508 (1%)	3,378 (2%)
Total cases		118,006 (100%)	182,529 (100%)	221,114 (100%)	231,197 (100%)

(Note: "Others" include compliments, suggestions, nuisance calls, wrongly-dialled calls and test calls. ICC does not maintain separate statistics for these types of calls.)

Source: Efficiency Unit

² An "enquiry" is one in which the citizen wants only to obtain information.

³ In a "complaint", the citizen is dissatisfied with some Government service and expects the departments to take remedial action and requires a reply.

⁴ In a "suggestion", the citizen is dissatisfied with some Government service and expect the departments to take remedial action but does not require a reply.

Demand for ICC service

10. Citizens' demand for ICC service has increased markedly from 1.8 million in 2004 to 3.1 million in 2007.

11. Manpower shortage has remained a major concern despite EU's attempt to increase the number of ICC staff and to devise new measures to cope with increasing demand, such as devising group skill sets, exploring new technology and even outsourcing. EU's estimate is that ICC will be operating to full capacity of 230,000 calls per month while fulfilling all the performance pledges within 2008.

12. ICC had to reject six departments' requests for subscription in 2007. Some client departments, e.g. the Post Office ("PO"), had considered dropping out of the ICC system because ICC could not extend its service to cover all PO's branch offices. PO's current plan is to outsource hotlines of 109 branch offices not covered by ICC, until ICC is able to meet its service requirements in the future.

Overall Performance

13. For the past four years, ICC has not been able to achieve its overall performance pledge of answering at least 80% of calls within 12 seconds, managing only to answer between 62% and 78% within the timeframe each year. Nonetheless, ICC managed to meet other performance pledges: namely to resolve at least 90% of calls at first point of contact and to have not more than 10% of the calls abandoned.

14. Depending on the nature of their services, ICC client departments have different performance pledges for handling complaints and enquiries. Client departments also have different timeframes for providing interim and final replies. Complainants are informed of the timeframes for interim replies but not final replies.

ICC's Role in Handling Complaints

15. ICC website states that ICC handles and processes complaints for the participating departments and provides an effective platform for resolving cross-departmental complaints. However, it does not explain ICC's precise role. On occasions, this has caused much confusion and frustration to complainants, and unwittingly, further grievance against departments.

16. In response to our enquiry, EU defines ICC's role as follows:
- (a) to provide a platform for the public to lodge complaints on services of all participating departments;
 - (b) to refer complaints to the appropriate departments for action;
 - (c) to monitor departments' response (including case acknowledgement, interim reply and final reply) so that citizens are informed of progress;
 - (d) to coordinate efforts and responses when a single complaint involves multiple departments; and
 - (e) to provide directory service for complaints related to services of non-participating departments.

17. In preparation for taking over a department's hotline functions, ICC develops a knowledge base and signs a Service Level Agreement ("SLA") with the department. The knowledge base is ICC's major source of information for responding to the public and contains information on a department's services and facilities, rules and procedures, publications and contact data, topical information and assignment guidelines. An SLA specifies the service levels, timeframes and manner of handling communications from the public and the data thereby generated to be captured by ICC. These service dimensions differ among departments depending on the nature of their services.

ICC's procedures for handling complaints

18. ***Logging of complaints.*** Upon receiving a complaint, an ICC agent will, with the aid of the knowledge base, obtain case details and log them into the computer system.

19. ***Referral of complaints.*** The agent will then refer the case to the responsible departmental subject officer. A department which refuses to take responsibility for a complaint may request ICC to reassign the case to another department. This referral and reassignment process will continue until a department accepts responsibility for the complaint.

20. ***Monitoring of complaints.*** ICC monitors the progress of complaints at four levels to ensure that:

- (a) departments have received ICC's referral and make timely interim and final replies (level-1);
- (b) departmental subject officer's supervisors are aware of delayed reassignment requests (level-2);
- (c) ICC agents keep complainants informed of progress when complaints are reassigned and urge departments to clarify responsibility when complaints are reassigned twice (level-3); and
- (d) ICC agents escalate complaints with no owner department to departmental management (initially to the Departmental Coordinator and then the Complaint Officer⁵) for decision 14 days after receipt of the complaints (level-4, also known as the "14-day rule").

21. ***Reply to complainants.*** Interim and final replies to complainants are, at departmental subject officers' discretion, either given by departments direct or relayed to the complainants through ICC. The direct contact numbers of departmental subject officers are made available to complainants only upon request.

22. ***Update and analysis.*** Based on the information provided by departments on individual complaints, ICC will update the knowledge base as necessary. Management reports on the statistics and types of service requests are provided to departments regularly.

23. These procedures apply to all client departments. They are also by and large applicable to non-client departments if three specified hot topics are involved (**para. 25**). For other non-clients, ICC will provide contact numbers and advise callers to approach the departments direct. ICC will make a referral if callers so insist.

Cross-Departmental Complaints and Service Improvement

24. Complaints that cut across the responsibilities of more than one department made up 5% (or 10,545) of the complaints in 2007. Some present problems for ICC, including difficulty in identifying owner departments and grey areas in departmental responsibilities.

⁵ Starting from August 2006, ICC requires each client department to nominate a Departmental Coordinator and a Complaint Officer for liaison, monitoring and escalation purpose. The Departmental Coordinator is pitched at working level while the Complaint Officer is pitched at directorate level.

25. To improve handling of such complaints, ICC has reviewed its complaint-handling in 2006. Among the improvement measures devised, ICC would act as a single point of contact for complaints related to three specified hot topics (vegetation management, slope safety and construction and demolition waste), even if only non-client departments are involved.

26. EU has also explored several approaches with departments to identify a party to assume responsibility for handling complaints that cut across multiple departments. However, such proposals were not supported by departments, and nothing resulted from EU's efforts.

Our Observations and Opinions

Scope of Service

27. The setting up of ICC was a commendable plan for public convenience and Government efficiency. Considering its track record of resolving over 90% of nearly 10,000 calls each day at first point of contact (**para. 13**), ICC is well placed to be a truly integrated call centre covering all Government departments and even public bodies for enquiries and simple complaints. However, ICC's current scope of service does not accord with its name and is far from achieving its ultimate goal of an **integrated one-stop** service. ICC carries only one-third of the 58 Government departments and agencies, not to mention the 21 Government-related organisations or public bodies⁶.

28. ICC's service is limited and patchy. It has not taken over all the hotline functions even of the 20 client departments. To the majority of Government departments, ICC essentially provides only directory service. Meanwhile, ICC is already operating at full capacity and has had to decline taking on additional commitments.

29. Despite EU's stated goal to replace ultimately all departmental hotlines with 1823, it does not have a concrete plan to achieve it. Its current stance appears ambiguous to us as it recognises some departments' preference for running their own hotlines and considers there to be merit in co-existence of 1823 with client departments' hotlines. In this context, EU should re-examine its long-term goal for ICC.

⁶ For the list of departments and organisations, please see the official Government website http://tel.directory.gov.hk/index_ENG.html.

Capability

30. There is incongruence between ICC's capability and its accountability. Intrinsicly, neither ICC nor EU is vested with the authority or expertise to handle substantive issues of complaint, to command a department to take ownership of a complaint or to take departments to task for deviating from agreed timeframes and arrangements.

31. The current heavy reliance on ICC to identify responsible departments when no department accepts responsibility for a complaint is unrealistic and inefficient. While citizens have legitimate expectations of ICC to pass their complaints aptly to the responsible department, ICC is totally dependent on departments for referral instructions. As the sole *de facto* Government "representative" "accountable" to complainants in such cases, ICC has no value addition except to pass the buck along to departments. This results in significant delay and inaction.

32. From our case studies, the most efficient and effective solution to cross-departmental complaints is often initiated and agreed among the departments themselves. We consider that as soon as responsibility is in doubt, ICC should alert all relevant departments in parallel so that they can discuss and establish ownership among themselves.

33. We regret that EU's attempts at exploring alternative, and potentially more effective and efficient, means of identifying owner departments did not gain support from departments (para. 26). Some of the suggestions have been practised and proven to work among individual departments. We consider that since ICC has not been able to effectively facilitate identification and ownership of responsibility that cut across multiple departments, it should escalate complaints to departmental management as soon as possible. If departments still fail to agree on ownership of complaints, ICC should seek EU senior management's intervention to escalate the complaints to the bureaux level for policy decision.

Capacity

34. We observe that ICC's measures to deal with manpower constraint (**para. 11**) are no panacea. Meanwhile, continued manpower shortage has taken considerable toll on ICC's operation, notably failure to meet its long-term goal, delay, continued failure to meet its pledge and risk of existing clients opting out. We see the need for a critical review of ICC's current scope of service and *modus-operandi*.

35. We consider ICC's endeavour to act as central repository for three departments (**para. 7**), despite its tight manpower situation, over-ambitious and arguably beyond its core functions.

However, we consider this system valuable and can be a saleable commodity for promotion among departments with ICC assisting in set-up within the departments themselves upon request.

Other Problems in Handling Complaints

Monitoring mechanism

36. Our study of cases reveals that the 14-day monitoring mechanism (**para. 20(d)**) does not significantly reduce the time departments spend in identifying ownership for complaints. Often, the trigger point of escalation is well after 14 days, since cases may require site inspection to determine responsibility. In most cases, therefore, ICC exercises discretion in postponing escalation until the referral process clearly reaches a deadlock.

37. Nonetheless, in most of the cases studied, we have found that **timely** escalation to Departmental Coordinators (**para. 20(d)**) would have resolved matters earlier. In this light, we see advantage in speedier escalation.

Mode of operation and supervision of cases

38. We observe that ICC's current mode of operation taxes individual agents' ability to grasp the status and development of complaints through review of records on screen to discern accurately and respond suitably within a short period of time. Agents' reaction is particularly pivotal for complicated complaints with lengthy history and cases of non-emergency nature but in need of urgent attention. In times of high call volume, such a demand can be particularly taxing for agents and may be prone to omission.

39. However, existing agent-computer interface and knowledge base are not conducive to easing call agents' work. The current agent-computer interface is presented in such a way that agents have to open a series of "windows" on screen to read consecutive actions, making it harder for them to follow development of lengthy cases within a short time.

Adherence to timeframes

40. Our case studies reveal that ICC and departments do not always adhere closely to the timeframes for action at various stages of processing a complaint. We understand that ICC agents' inability to adhere to timeframes may be attributable to capacity overload. To promote adherence by departments, some incentive or award scheme needs to be devised for compliant departments to recognise and encourage them.

Gauging performance and satisfaction

41. ICC provides client departments with the compliance rate of the overall performance pledges applicable to all calls. However, it does not systematically gauge or report the compliance rate of the specific action standards and timeframes agreed with the departments. We also notice that ICC does not regularly gauge the satisfaction of specific types of users e.g. complainants. We consider that ICC should conduct regular surveys on these areas for service monitoring and improvement.

Public perception

42. We notice that the way ICC currently publicises, or rather does not publicise, its role in handling complaints is a source of confusion, misconception and false expectations to the public. As ICC's main channel of publicity, the websites of ICC and its client departments do not set out ICC's exact role in handling complaints. The ICC website merely mentions that ICC "processes" complaints from the public. Complainants, therefore, can easily harbour false expectations that ICC may adjudicate and pass judgment on their cases.

Indirect communication

43. The way ICC currently handles complaints on behalf of departments shields the latter from direct contact with complainants upon initial receipt and even further on, as departmental subject officers have full discretion whether to reply to complainants direct or to leave it to ICC to relay their reply.

44. We consider that relay of replies by ICC may work for simple and clear-cut questions and answers. However, it does not work for more complex matters, which often entail clarification of earlier replies and therefore repeated relay by ICC. This is not only cumbersome and irksome for complainants, but may also cause defective or deficient delivery and delay, as shown by our case studies.

45. In some cases, departments actually communicated with other departments through ICC. In our view, this is inefficient and quite unnecessary, when normally the departments would have communicated with one another direct.

46. We consider that departments should be encouraged to reply to complainants direct to make for more personal service and ready clarification where necessary. ICC should recognise the need for some complainants to discuss their complaints with departmental subject officers directly,

especially now that even departmental hotlines are transferred to 1823 and the public is more distanced from departments.

Conclusions

47. We believe in the concept of an integrated one-stop call service for public convenience and Government efficiency. Overall, we commend ICC's performance as a call centre, particularly its continuous and earnest efforts to sustain service standards and strive for improvement, notwithstanding the high call volume and manpower constraint.

48. Considering its track record (**paras. 13 and 27**), we consider ICC to be well placed to be a **truly integrated, one-stop and easy-link call centre** to cover all Government departments, and even public bodies, in terms of enquiries and simple complaints.

49. However, the handling of more complex complaints – especially those with multiple departments – leaves much to be desired. ICC inherently lacks the capability to coordinate among Government departments in handling issues involving multiple departments.

50. With its present scope, ICC as an “**integrated**” call centre is a misnomer. ICC's value and purpose in handling complaints lies in its being an all-time access point that transcends departmental boundaries. The current situation, where it continues to fall short of its goal of serving all departments, is misleading to the public and unsatisfactory in principle.

51. ICC has to make a choice. If it is to remain an “integrated” service, then it should encompass the entire Government, not just serve some departments. Alternatively, if it decides that, in the face of harsh reality, it can serve only some departments, its limited scope should be openly acknowledged and duly reflected in its name.

52. Meanwhile, until the Administration has decided ICC's scope of service in the long term, it should improve ICC's current operations, especially in handling complaints.

Recommendations

53. The Ombudsman's following recommendations for the Administration aim to help put this commendable service on track to achieve its vision and mission.

Scope of service (Long-term)

- (1) ICC should review its *modus operandi* with a view to providing a truly “integrated” service for a “joined-up Government”, as intended and map out its short-term and long-term plans to this end, having regard to its capability and capacity.

If not, ICC should consider revising its name to accord with its limited service and to avoid unrealistic public expectations.

In brief, ICC should redirect its resources to offer a “one-stop service” for public sector directory, general enquiries and simple complaints.

Operational and technical improvements (Short-term)

Capability and accountability

- (2) EU should initiate discussion with bureaux to resolve problems with cross-departmental complaints.
- (3) Once a complaint case reveals unclear demarcation of responsibility among departments, ICC should alert and ask at once all departments involved to discuss and establish ownership among themselves.

Central repository

- (4) ICC should extend its techniques and technology associated with central repository service to assist departments to set up a comprehensive complaint tracking system upon request.

Enforcement of monitoring mechanism

- (5) ICC should enforce the monitoring mechanism more proactively by escalating promptly any complaint, for which no department would accept responsibility, 14 days after receipt of the complaint.

Agent-computer interface

- (6) ICC should review existing agent-computer interface in consultation with its users to ensure that the interface is simple and readily comprehensible.

Cases requiring urgent attention

- (7) ICC should confer with departments to review the guidelines and procedures for handling complaints requiring urgent attention to ensure that the knowledge base provides clear instructions to agents.
- (8) To familiarise call agents with situations that require urgent attention, ICC should strengthen training to increase their awareness of such complaints and the guidelines on procedures.

Adherence to timeframes

- (9) ICC should provide incentives or awards to client departments for best record for compliance by, say, publishing yearly reports to recognise good performers and promote best practices.

Gauging performance and satisfaction

- (10) ICC should gauge the compliance rates of the various timeframes and departmental performance pledges and to provide such data to Heads of Departments for monitoring purpose.
- (11) ICC should conduct regular and systematic surveys to gauge complainants' satisfaction level.
- (12) ICC should regularly survey the satisfaction level of all users of ICC service i.e. both client and non-client departments.

Promote understanding of ICC's role

- (13) ICC should spell out in its website its role and service, procedures and timeframes. Departments should likewise in their own publicity measures clarify their relationship with ICC.

Direct communication

- (14) Departments should be requested to make direct contact with complainants and fellow-departments where complex or multiple issues are concerned.
- (15) ICC should request departments to state the name and contact number of departmental officers in charge of a complaint in both interim and final replies.

54. We support having an integrated one-stop call service for public convenience and Government efficiency. However, ICC's present *modus operandi* does not achieve this. Instead, it labours under considerable constraint and raises unrealistic public expectations. Our recommendations aim to help put this commendable service on track to achieve its vision and mission of providing a truly integrated service for a joined-up Government.

Comments from EU

55. Head of EU has consulted the 20 client departments and indicated her intention to implement all our recommendations, even specifying timeframes for most of them. Having carefully considered her comments, we have incorporated factual points and recent updates into our final report, where appropriate.

56. On our observations about ICC's handling of cross-departmental complaints (**para. 5.11**), EU considers that there is a genuine public need for ICC to continue to perform its existing function, i.e. to respond to citizens' complaints and identify the responsible party to resolve cross-departmental issues in a timely and effective manner. Besides, there is no alternative Government body that a citizen can turn to for such role. EU, therefore, reckons that ICC should instead just be more robust with its approach in handling such complaints.

57. As for the recommendation about the name "Integrated Call Centre" (**para. 53(1)**), EU considers the name an appropriate description of ICC's functions, as ICC is now providing

an integrated service covering the handling of enquiries, complaints and suggestions for its 20 client departments. It is also integrated in the sense that citizens may select to contact ICC by phone, email, fax or online form. If a case originally related to one client department is later found to “belong” to another, ICC is responsible for referring the case to the correct subject officer and monitoring the progress, as well as coordinating actions and responses of different departments, until the case is satisfactorily resolved.

58. EU considers that the name “Citizen’s Easy Link” (政府熱線), rather than “Integrated Call Centre”, is misleading to a certain extent and has created unrealistic public expectations of ICC covering the whole Government. In this context, EU undertakes to standardise ICC’s name to “Integrated Call Centre”.

59. On the recommendation that ICC should offer only service for public sector directory, general enquiries and simple complaints (**para. 53(1)**), EU considers it difficult both for ICC and/or a complainant to define what are simple complaints at the outset. Instead of giving up its role in handling complex complaints, EU considers it better to improve its value-addition.

60. EU cited two recent instances of departments seeking ICC assistance in handling general enquiries hotlines to exemplify departments’ recognition of ICC’s effectiveness.

OMBUDSMAN’S FINAL REMARKS

61. We do not decry or dispute the merits of an “integrated call centre” as a concept for unity of service and convenience to the public. Clearly a single easily memorable hotline (1823) for enquiries, and even complaints, round-the-clock across the whole spectrum of Government departments is a boon for Hong Kong citizens. Our concern has been, and remains, whether ICC’s current mode of operation, scope of service and capacity can truly match (or be said to match) its original intention or ultimate ambition.

62. There may not be any “alternative Government body” to identify or resolve cross-departmental responsibilities. However, experience has shown that for timely and effective resolution of cross-departmental complaints, it is not adequate just for ICC to be “more robust” in handling such complaints. The fundamental problem does not lie with ICC. Given ICC as a service centre for client departments, each with specific individual duties, it is difficult for ICC to impose upon them but early resolution depends on inter-departmental cooperation. It is cumbersome and time-consuming, possibly ineffectual, for a service agent like ICC to be checking out one department after another. In this connection, ICC could

unwittingly become an agent for buck-passing. Nevertheless, ICC can still help departments monitor and guard against delays and continue to be the contact point for complainants.

63. We note EU's rendition of its name as an indication of its integrating the functions of answering enquiries and complaints, albeit only for some departments, through different modes of reception. However, it is questionable whether the common citizen would view the nomenclature "Integrated Call Centre" or "綜合電話查詢中心" in the same context. Without integrating the services for enquiries and complaints of all Government departments, ICC shall continue to fall short of public expectations and the express objective in its own vision statement. It is necessary that EU clarify the role and ultimate goal for ICC after a realistic review of its *modus operandi*, to avoid confusing the public and attracting complaints against ICC itself.

64. Our recommendation that ICC should concentrate on general and directory enquiries and simple complaints aims to relieve ICC capacity for delivery of core duties for which it has proven its value and to facilitate its coverage of Government overall, thus becoming a truly "integrated" call centre, the *bona fide* "綜合電話查詢中心" and "政府熱線". However, EU has expressed concern over the difficulty in differentiating simple from complex complaints.

65. For identifying simple complaints, we suggest for consideration and as a guide, those involving a single department and fully satisfying the complainant after one referral to the department for response via ICC. If follow-up issues or queries are raised, ICC should return the complaint to the department for further reply direct.

66. Regarding the two cited recent instances of departments seeking ICC assistance in handling general enquiries hotlines, we have no doubt about ICC's ability in handling general and directory enquiries. Our recommendations are precisely to capitalise on this clear advantage and track record of ICC.

Acknowledgements

67. The Ombudsman thanks the Head of EU and her colleagues for cooperation and assistance throughout this investigation. We look forward to their progress in implementing our recommendations.

Office of the Ombudsman
June 2008

Hotlines, Email Addresses and Fax Numbers Handled by ICC

Year of participation	Department	Hotlines/email/fax	Nos / Address	Remarks
2001	FEHD	Complaint	1. 2923 5050	
		Departmental Hotline (IVRS)	2. 2868 0000	
		Email (General)	3. enquiries@fehd.gov.hk	
		Email (Clean HK)	4. cleanhongkong@fehd.gov.hk	
2001	TD*	Departmental Hotline (IVRS)	5. 2804 2600	
		Fax - Urban Regional Office (HK)	6. 2824 0399	Redirected manually by respective sections of department (as central repository)
		Fax - Urban Regional Office (Kln)	7. 2397 8046	
		Fax - NT Regional Office	8. 2381 3799	
		TD Headquarters	9. 2824 0433	
Email	10. tdenq@td.gov.hk			
2001	BD	General Enquiry & Complaint Hotline	11. 2626 1616	
		Complaint Hotline Against Unauthorised Building Works (IVRS)	12. 2626 1313	
		Building Safety	13. 2626 1234	
		Building Safety Loan Scheme	14. 2626 1579	
		Existing Building HK	15. 2626 1642	
		Existing Building Kln	16. 2626 1257	
		Existing Building NT	17. 2626 1270	
		Fire Safety	18. 2135 2416	
		Licensing	19. 2626 1085	
		New Building HK	20. 2626 1382	
		New Building Kln	21. 2626 1551	
		New Building NT	22. 2626 1482	
		Port and Airport Development & Rail	23. 2626 1566	
		Site Monitoring	24. 2626 1700	
Slope Safety	25. 2135 2525			
2001	HyD*	Departmental Hotline	26. 2926 4111	
		Headquarter	27. 2714 1111	
		Urban Region	28. 2923 7777	
		Urban (Kowloon) Region	29. 2927 4444	
		NT Region	30. 2926 4222	
		Lighting Division	31. 2388 9765	
		Lighting Division	32. 8102 6686	
		Bridge & Structure Division	33. 2495 1155	
		Email (enquiry)	34. enquiry@hyd.gov.hk	
		Email (complaint)	35. complaint@hyd.gov.hk	
		Fax (Headquarters, Public Relations Unit and all other sections, units, regions)	36. 2714 5216 37. 2187 2243 38-67. and around 30 fax nos to individual units, sections, regions	Redirected manually by respective sections of department to ICC (as central repository)
2001	EMSD	General Enquiry	68. 2882 8011	

* ICC acts as central complaints registry for these departments by maintaining a full register of complaints received through all channels.

2002	LCSD*	Customer Service	69. 2414 5555	
		Departmental Hotline (IVRS)	70. 2603 4567	
		Hong Kong Public Library Hotline	71. 2921 0208	
		Hong Kong Central Library Hotline	72. 3150 1234	
		Email	73. enquiries@lcsd.gov.hk	
2002	EPD	(withdrawn)	-	-
2002	MD	General Enquiry	74. 2815 0908	
		General Enquiry (IVRS)	75. 2542 3711	
2002	AFCD	Departmental Hotline (IVRS))	76. 2708 8885	
		Animal Management Centre	77. 2362 3257	
2002	CEDD	Slope Safety	78. 2885 5888	
			79. 2762 5165	
2002	RVD	General Enquiry	80. 2152 0111	
		General Enquiry (IVRS)	81. 2152 2152	
2002	SFAA	General Enquiry (IVRS)	82. 2802 2345	
		Continuing Education Fund	83. 3142 2277	
2002	Post Office	General (IVRS)	84. 2921 2222	Covers some, not all, branch offices
2003	Arch SD	Departmental Hotline	85. 2867 3628	
2004	LD	General Enquiry	86. 2717 1771	Outside normal office hours only to ICC
2005	CR	Departmental Hotline (IVRS)	87. 2234 9933	
		General	88. 2867 2600	
			89. 2867 2604	
		Registration of documents	90. 2867 4582	
			91. 2867 4579	
			92. 2867 4581	
			93. 2867 4580	
Company Search	94. 2867 4584			
	95. 2867 2584			
96. 2867 2571				
2006	OGCIO	GovHK Enquiry Hotline	97. 183 5500	
		Email	98. enquiry@1835500.gov.hk	
2007	TCO / DH	Enquiry & Complaint Hotline	99. 2961 8823	
2007	LR	General Enquiry (IVRS)	100. 3150 0000	
2007	DSD	Drainage Complaint Hotline	101. 2300 1110	Overflowed calls only
2008	SWD	General Enquiry on Social Security Matter for SWD Hotline	102. 2343 2255	
-	HAB	Equestrian Hotline	103. 2107 9955	Ad Hoc Project [#]
		Recruitment of Volunteers for the Beijing Olympic & Paralympic Games	104. 2591 6690	Ad Hoc Project [#]

[#] ICC assists departments and bureaux on a project basis by answering enquiry hotlines of ad hoc public campaigns.

Investigation Report

Complaint against Hong Kong Examinations and Assessment Authority

The Complaint

In April/May 2008, this Office received nearly 100 complaints about the 2008 Hong Kong Advanced Level Examination (“HKALE”). The complainants criticised the Hong Kong Examinations and Assessment Authority (“HKEAA”) for unreasonably changing the marking schemes for Sections A and E of the subject Use of English (respectively “UEA Paper” and “UEE Paper”). Their complaint points are summarised as follows:

- (1) Task 6 of UEA Paper (Listening Test) asked candidates to use “✓” or “✗” to indicate a “yes” or “no” answer. Some candidates did not follow instructions and left some boxes blank. HKEAA changed the marking scheme by treating the blank boxes as “no” answers and awarded marks on this basis.

- (2) Task 1 of UEE Paper (Practical Skills for Work and Study) asked candidates to write a letter of “about 500 words”. However, some candidates had written more than 500 words. HKEAA again changed the marking scheme to disregard the word limit and awarded marks to writing above the 500 word limit.

Investigation Process

2. On 5 May, with consent from the complainants, we started our inquiry with HKEAA. In view of the large number of candidates likely to be affected and its possible impact on the public examination system in Hong Kong, The Ombudsman decided on 16 May, on grounds of public interest, to conduct a full investigation under The Ombudsman Ordinance.

3. As the HKALE results will be released on 30 June, The Ombudsman decided to expedite investigation so that our findings could be announced early to alleviate candidates’ concern. On 31 May, HKEAA provided this Office with relevant information. During the investigation process, HKEAA staff met and discussed this case with our investigators a few times.

4. On 6 June, we sent our draft investigation report to HKEAA. They commented on 12 June. In the light of their views, we made some amendments to the report and concluded the case.

Setting of Examination Questions and Marking Schemes

5. HKALE questions are set by the HKEAA Moderation Committee, which comprises a chief examiner, question setters, moderators and a Manager (Assessment Development). The Manager (Assessment Development) is a full-time staff and the others work part-time for the HKEAA.

6. Marking Schemes are guidelines for markers devised by the Moderation Committee.

7. For each subject, HKEAA has a panel of markers, comprising a chief examiner, an assistant examiner and a Manager (Assessment Development). After each examination, the panel will scrutinise a number of examination scripts (about 1%) to analyse candidates' performance with a view to establishing a unified marking standard for the subject. The panel will, where necessary, revise the marking scheme.

8. The chief examiner will then convene a markers' meeting of all markers to explain the marking criteria. To better understand the marking scheme, markers mark sample scripts and convey their views to markers' meeting. In response to these views, the meeting may further revise the marking scheme and decide on the circumstances under which markers may exercise discretion in giving marks to the candidates.

9. All markers must follow the criteria of the marking scheme to ensure consistency.

Task 6 of UEA Paper (Complaint point (1))

Task Instructions

10. The UEA Paper was a listening test. Candidates were asked to listen to a recorded conversation in which the host explained the rules of a game called "Survival Hong Kong". He talked about items which players were allowed to bring to a deserted island and those items they were not allowed to have. After listening, candidates were required to complete Task 6. The instructions for Task 6 were:

“What the players are allowed to have: Put ticks or crosses. One has been done as an example.”

11. The full version of the task instructions has been reproduced at the **Annex 2**.

Original Marking Scheme

12. According to HKEAA’s intention and the original marking scheme, candidates were expected to put in the boxes provided a “✓” for items that were “allowed to have” and a “✗” for those “not allowed to have”. Marks would be given for correct answers, whilst wrong answers would neither score nor lose marks.

Revised Marking Scheme

13. After the examination, the panel of markers marked about 600 examination scripts in accordance with the established procedures mentioned in paragraph 7 above. Most candidates had marked all the boxes with “✓” or “✗” (Category One candidates), a small number of candidates had put “✓” or “✗” in some boxes and left the rest blank (Category Two candidates), yet others had put “✓” in some boxes and left the rest blank (Category Three candidates). The panel inferred the following “intended answers” from these three categories of candidates:

Category One candidates

“✓” indicated items that were “allowed to have”,
and “✗” indicated those “not allowed to have”;

Category Two candidates

“✓” indicated items that were “allowed to have”,
“✗” indicated those “not allowed to have”,
and boxes left blank meant unattempted question;

Category Three candidates

“✓” indicated items that were “allowed to have”,
while the blank boxes indicated those “not allowed to have”.

14. After discussion, the markers’ meeting decided to revise the marking scheme such that the scripts would be marked on the basis of the “intended answers” of each category of candidates.

15. According to HKEAA, the panel found that most candidates, as a matter of habit, used “✓” to indicate “yes” (items allowed to have) and “✗” to indicate “no” (items not allowed to have). This showed that these candidates knew which items were allowed and which were not.

16. HKEAA pointed out that the marking scheme should be based on the assessment objectives and revised according to the “intended answers” of candidates. The Authority considers it a major “professional principle” to mark scripts in the light of candidates’ “intended answers”, if the “intended answers” are clear.

17. HKEAA believed that the scripts should be marked with candidates’ best interest in mind. It is, therefore, normal for the Authority to use discretion in awarding marks in special cases, and that this should not be considered unfair. In the present case, its revised marking scheme had catered for all the different approaches adopted by candidates. HKEAA, therefore, considered that it had fairly treated each script based on the original assessment objectives.

18. In response to our investigation, HKEAA randomly selected 1,000 scripts for analysis. This showed that Category One accounted for about 86% and Categories Two and Three each accounted for about 7% of the candidates who took the UEA Paper .

Flaws in Task Instructions

19. As stated in paragraph 12 above, HKEAA **originally intended that** candidates should complete Task 6 by using “✓” to indicate items that were allowed to have and “✗” to indicate those that were not allowed.

20. However, the **literal meaning** of the instructions of Task 6 (see **para. 10** above) conveyed a completely different message. The instructions specifically asked candidates to use either “✓” **or** “✗” to indicate “allowed to have”. The example given also used a “✓” to indicate a sea shell as an item “allowed to have” (see **Annex 2**). No example was given on what a “✗” would indicate. Hence, on this basis, candidates who had used either “✓” or “✗” to indicate items that were “allowed to have” would have provided the correct answers, in full compliance with the instructions of the Task. Likewise, it would also have been correct if a candidate were to use both “✓” and “✗” to indicate items that were “allowed to have”, although using both “✓” and “✗” to indicate affirmative answers goes against the habitual usage of those signs.

21. Moreover, the instructions provided no guidance on how to indicate items that were “not allowed to have”. Thus, a blank box could be taken to mean either an item “not allowed to have” or an unanswered question.

22. In short, the instructions of Task 6 had not only failed to reflect HKEAA's original intention, but also to provide clear guidelines for candidates. Consequently, with candidates using different approaches to complete the Task, HKEAA could only resort to using discretion based on a general understanding and customary usage of the signs "✓" and "✗" to infer candidates' "intended answers" and mark their scripts accordingly.

23. We must point out that of the three categories of candidates (see **para. 13** above), Category Three candidates (i.e. candidates using "✓" to indicate items "allowed to have" and leaving boxes blank to indicate those "not allowed to have") were the only one who had answered the question correctly, in compliance with the instructions. Conversely, while Categories One and Two candidates (i.e. using "✓" to indicate items "allowed to have" and "✗" to indicate those "not allowed to have") understood the contents of the recording and conformed with HKEAA's original intention, they had failed to answer the question on the basis of the instructions given.

24. We understand that in marking scripts according to the "intended answers" instead of adhering to the instructions given, HKEAA was not to make candidates lose marks for the task. Regrettably, this would have the undesirable outcome of the Authority encouraging candidates to disregard the specific instructions in examination questions.

25. If this were an IQ test, there could perhaps have been room for some flexible interpretation of the meaning of the instructions. However, the subject in question is Use of English, and the instructions given were concise and specific, leaving no room for any other way of interpretation and it was odd that HKEAA should have to guess the candidates' "intended answers". We, therefore, can find no basis for HKEAA to adopt a different, discretionary approach in using candidates' "intended answers" as the basis for marking this Task. However, we have to accept that the methodology of marking examination scripts pertains to HKEAA's professional judgment.

Conclusion

26. In this case, the complainants accused Category 3 candidates for not following the instructions and said that they should not be awarded marks, when in fact it was the complainants themselves who had adhered to the convention mentioned in paragraph 15 above and disregarded the specific requirement of the instructions. They were wrong. The Ombudsman, therefore, considers Complaint Point (1) **unsubstantiated**.

27. It is clear that HKEAA had failed to provide candidates with appropriate and accurate task instructions. As a result, candidates used different approaches in completing the task. This situation was particularly lamentable when HKEAA itself had repeatedly stressed that candidates should follow instructions in answering questions and that those who failed to do so would suffer

the consequences. The Authority should be held responsible for allowing such a mistake to slip through its various checking mechanism. The Ombudsman, therefore, considers that despite Complaint Point (1) not being substantiated, there had been **maladministration on the part of HKEAA other than alleged**.

Task 1 in UEE Paper (Complaint Point (2))

Task Instructions

28. Section E was an examination on “Practical Skills for Work and Study”. Using information provided, candidates were asked to write a letter of **about 500 words** to a newspaper editor, with the following instructions:

“Using information from pages 2 to 10 of the Data File, write a letter of **about 500 words** to the editor of the *Hong Kong Post* in response to the letter from Simon Pang. You should follow the instructions in Margaret Tang’s first email on page 2 of the Data File.”

Marking Scheme

29. HKEAA indicated that the task required candidates to write a letter that was brief, concise and to the point. Its length and the number of words used was not crucial. Therefore, the marking scheme emphasised the content of the letter and candidates’ writing skills. The assessment criteria were clearly set out in the answer book for candidates’ reference.

30. Markers would read each script in its entirety. If the letter was too long, the candidate would lose marks on “Balance” and “Conciseness”; he might also score lower on “Relevance”, “Paraphrasing” and “Readability and Organisation”. Candidates should not just copy information from the Data File, but had to select relevant information. Candidates would not score high marks if they copy indiscriminately from the Data File, regardless of the number of words used.

31. HKEAA had not revised the marking scheme for this task, as alleged by the complainants.

Conclusion

32. We accept HKEAA’s view that this question only required candidates to write a letter of “about 500 words”, without specifying an upper or lower word limit. The Authority had repeatedly highlighted to the public that different marking schemes are devised to meet the

requirements of different examination questions. Consequently, examination criteria might vary from year to year. Candidates must therefore read the instructions carefully, to ensure a proper understanding of the requirements of each question.

33. Complaint Point (2) was, therefore, **unsubstantiated**.

Final Remarks

34. Overall, this complaint was **unsubstantiated**. However, in view of the flaws in the task instructions as revealed by Complaint Point (1), The Ombudsman considers the complaint **substantiated other than alleged** and offers the following views.

35. Education aims to develop students' intellectual and personal potential in a holistic manner. Examination is a means of testing and not the ultimate goal of education. However, in reality, students' results in public examinations have a far-reaching impact on their future, whether they pursue further studies or seek employment. Examination results are often regarded as indicators of a person's knowledge and capability. Hence, society has legitimate expectation that its public examination system can appropriately and fairly assess its students, so that their results adequately reflect their standards.

36. The setting of examination papers and formulation of marking schemes require meticulous planning and execution, and they impact directly on the credibility of the examination system. All involved in the administration of public examinations must be vigilant lest mistakes in their planning and execution, even minor mistakes, if occurring frequently, would undermine confidence in Hong Kong's examination system by the community, overseas academic institutions and examination authorities, and may ultimately damage the reputation of our education system.

37. This case has revealed that despite HKEAA's fairly elaborate checks and monitoring mechanism for drafting, vetting, assessing and finalising of examination questions, the system had failed to identify a simple mistake. We see this as a serious weakness in HKEAA's checking system and would urge the Authority to review.



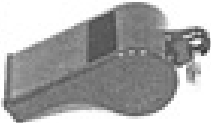



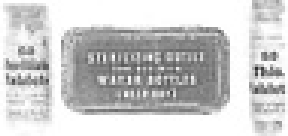

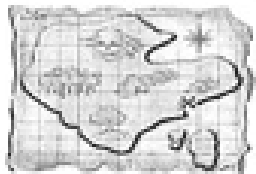


38. In 2002, this Office conducted a direct investigation into HKEAA's arrangements for the HKALE and the Hong Kong Certificate of Education Examination and made ten recommendations for improvement. Despite full implementation of the recommendations by HKEAA, we find it quite unacceptable that the system still allowed such a mistake as had been revealed in the investigation of this case.

39. In this light, The Ombudsman has decided to initiate follow-up direct investigation to examine deeper into HKEAA's mechanism of setting examination questions, with a view to identifying further room for improvement.

Office of The Ombudsman

June 2008

6. What the players are allowed to have: *Put ticks or crosses. One has been done as an example.*

<p>A <input type="checkbox"/></p> 	<p>B <input type="checkbox"/></p> 
<p>C <input type="checkbox"/></p> 	<p>D <input type="checkbox"/></p> 
<p>E <input type="checkbox"/></p> 	<p>F <input checked="" type="checkbox"/></p> 
<p>G <input type="checkbox"/></p> 	<p>H <input type="checkbox"/></p> 
<p>I <input type="checkbox"/></p> 	<p>J <input type="checkbox"/></p> 
<p>K <input type="checkbox"/></p> 	<p>L <input type="checkbox"/></p> 