

Complaints, Suggestions and Compliments Policy

Purpose

To operate an effective system for receiving and realising benefits from compliments and other feedback in order to identify good practice, strengths and weaknesses and highlight what The Wye Clinic does well, together with suggestions for service developments and other improvements.

To operate an effective system for the management of Client complaints that leads to the identification of areas for improvement, lessons learned and drive positive change through negative input.

Equality Impact Assessment The Wye Clinic have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

Scope

The following may be affected by this policy

- All staff
- Clients
- Family
- Advocated

Objectives

To have in place a comprehensive system for complaints, compliments, suggestions and other feedback that informs Clients of ways in which their views can be heard, how procedures work and why all feedback is important to The Wye Clinic to ensure high quality of care and an excellent Client experience.

To ensure that all complaints and suggestions are promptly addressed, resolved and shared within the agreed timescales to ensure that lessons are learnt and that the learning improves the service quality and delivery.

To ensure that all team members are trained and supported in the facilitation of complaints procedures and are fully compliant with their own professional, obligatory requirements within their scope of practice.

To have an effective method of identifying and monitoring complaint patterns, trends and themes to share with the Clinic Team, Clients and stakeholders, together with the evidence to be similarly shared, demonstrating change for service improvement and a better Client experience based on feedback and suggestions received.

To implement an honest and open culture within The Wye Clinic whilst actively seeking and acting upon Client feedback.

Policy

Complaints

In relation to complaints, received The Wye Clinic will demonstrate that the Clinic Team

- Understand the importance of dealing effectively with complaints in a timely manner, as well as acknowledging and acting on feedback received.
- We will ensure that all complaints are directed to the designated complaints manager Sharon Smith or Tracy Kelly.
- Recognises that failure to deal with a complaint is a serious matter.
- Will try and resolve verbal complaints to the complainant's satisfaction within 24 hours in order to avoid formal complaints process, as it can be difficult to separate a complaint from a concern, this policy will be followed whenever dissatisfaction is clearly expressed.
- Will acknowledge a complaint and offer a discussion about the handling of the complaint with the complainant within 3 working days of receiving the complaint.
- Will keep the complainant informed if a response is delayed.
- Has functional knowledge of how to deal with complaints which is equitably applied.
- Consider the quality of care provided by putting themselves in the place of the Clients and assessing their expectations for the service
- Reviews services and how they are delivered in relation to complaints and feedback received.
- Makes changes where necessary or appropriate to improve services and the Client experience
- Monitors output from changes and developments as part of a continuous cycle of improvement
- Shares feedback and changes made with Clients, stakeholders and Clinic staff.
- Keeps accurate records and documentation for all complaints and feedback
- Provides access to Clients for information about how to make a complaint, the complaints process and timescales via the website and in the practice in appropriate or specific requested accessible formats
- Understand statutory obligations in respect of the Duty of Candour and will follow the agreed policy and procedure.

Complaints, Suggestions and Feedback

The Wye Clinic will ensure that services delivered are effective and responsive to the needs of Clients, carers and other users by encouraging and welcoming feedback from clients about the service and their experiences.

The Wye Clinic will strive to establish and maintain a Client Participation Group and make efforts to

- Identify areas of good practice, strengths and what The Wye Clinic does well
- Identify areas for improvement, lessons learned and any changes to be made as a result
- Demonstrate that The Wye Clinic values Clients and others' concerns and comment about the work of the team by making changes in response to feedback received

The Wye Clinic will reflect on compliments, suggestions and other feedback received formally and informally depending on the content. A record of all compliments, suggestions and other feedback will be maintained together with the register of complaints. The Wye Clinic will talk to the team about compliments, complaints and suggestions in the Quality and Governance Meeting and the Senior Management Meeting.

The Wye Clinic will submit an annual audit to the board of Director for trend and themes analysis.

Procedure

- Complaint received into The Wye Clinic – The Team will endeavor to resolve immediately
- Staff will explain the complaints process as described in the procedure steps
- Staff to report to the complaint to Sharon Smith and Tracy Kelly where they will ring the patient within 24 hours.
- Sharon Smith will assess the complaint and assess it for further action and logging
- If a complaint can be resolved to the complainant's satisfaction within 24 hours it does not need to go through the formal complaints process
- If it cannot be resolved to the complainant's satisfaction within 24 hours, the complaint will be recorded as a formal complaint, if the complaint is not the Client, consent to investigate and resolve the complaint must be obtained from the client.
- Acknowledgement of the complaint will be made to the complainant in writing within 3 working days, detailing the complaint and that an investigation will be undertaken.
- Where possible and appropriate, a discussion will take place with the complainant to understand their expectations and preferred outcome(s) and aim to manage their concerns to their preferred outcome (s), dependent on the nature of the complaint. An action plan and timescale will be agreed along with the complainants preferred method of communication
- The complaint will then be investigated after which the complainant will receive a reply and response as agreed in the plan and a meeting offered if necessary and appropriate
- Should the complainant be dissatisfied with the response, further discussion and efforts must be made to resolve the complaint, including local mediation and arbitration where appropriate.
- Where all attempts to resolve the complaint locally have been unsuccessful, details of the Independent Sector Complaints Adjudication Service (ISCAS)

Receiving a Complaint

A complaint can be received either verbally or in writing and can be made by:

- Clients
- Someone acting on behalf of a Client with their written consent, for example a relative, advocate or Member of Parliament
- Someone acting on behalf of a Client who is unable to represent his or her own interests provided this does not conflict with the Client's right to confidentiality or a previously expressed wish of the Client

Once a complaint is received, it must be managed using the formal process. The Wye Clinic will acknowledge the complaint in writing within three working days of the complaint being received.

The acknowledgement is not required to address any of the issues relating to the detail of the complaint itself but is to advise and reassure the complainant that the matter will be investigated.

The Wye Clinic will establish a practical plan and direction for the investigation at an early stage as this will be beneficial for all involved in the long run, assisted by the complaints handling planning tool

at <https://www.bma.org.uk/advice/employment/gp-practices/service-provision/nhs-complaints-procedure>.

Investigating Complaints

Before beginning an investigation, The Wye Clinic will assess the seriousness of the complaint, If a complainant does not wish to pursue an issue, The Wye Clinic will investigate the issue to identify what led to the complaint so that The Wye Clinic can use complaints as part of the Learning and improving cycle to assist in service improvement.

The complainant may be invited to meet with Sharon Smith to discuss the complaint. This may be done face to face, online, or over the telephone if appropriate. It is important to

establish, at the earliest opportunity, what outcome the complainant expects, and to let the complainant know whether this is a realistic and possible expectation.

The Wye Clinic will support all members of staff involved in the complaints process.

Complaints can be made either by Clients or by someone who is affected, or likely to be affected, by the action, omission or decision of the responsible body that is the subject of the complaint. This means that potential complainants can be almost anyone, which in turn can present the risk of a vexatious complaint. Vexatious complaints that come directly to The Wye Clinic can be rejected with confirmation of the rejection and the reasons for the rejection being communicated to the Client.

The Independent Sector Complaints Adjudication Services (ISCAS) is the recognised complaints framework for the independent healthcare sector, serving patients, the public and healthcare organisation. If all attempts to resolve the complaint locally are unsuccessful, you can seek the services of ISCAS.

Anonymous Complaints

Anonymous complaints received will be investigated in the same way as named complaints. They will be logged and any corrective action necessary will be taken and recorded and kept on file for the individual to access, should they make themselves known.

The Complaints Register

This will contain all correspondence from each complaint received including the following:

- Details of the complaint including subject matter, date of receipt and method of receipt
- Date and method of acknowledgement
- Notes from any meetings with the complainant wherever possible agreed with the complainant by countersignature
- Details of any reason for delay where investigations took longer than any agreed response period and evidence of keeping the complainant informed of any delay.
- The date the response letter was sent to the complainant
- Dates when the complaint was discussed in The Wye Clinic Meetings

- Changes or developments made in response to the complaint
- Learning from the complaint to improve quality of care

Complaints to be shared for learning purposes will be anonymized by removing all identifiable clients information or details and information pointing to all identity of the complainant.

Time Limits for Submitting a Complaint

Complaints will normally be made within 12 months after the incident that gave rise to the complaint, or from the time the complainant was made aware thereof. It is possible to extend this timescale if there are good reasons for the complainant not to have raised the matter sooner, and a fair investigation can be carried out.

Complaints About Locums, Agency or Temporary Staff

The Wye Clinic will obtain agreement from contractors, bank nurses and other temporary staff members for them to participate in the complaints procedure if required, as it is possible that complaints will arise after the locum or temporary member of staff has moved on.

The Wye Clinic will give contractors and temporary members of staff involved in the complaints process every opportunity to respond to complaints with no discrepancy between the way the process treats temporary staff or permanent staff members.

Complaints Files and Records

A separate file will be kept for complaints records and letters. These must never appear in a Client's electronic or paper medical records or that of a complainant who is not the Client who is a registered Client of The Wye Clinic.

Any complaint resolved by the Practice via the formal complaint's procedure will be kept on record for 10 years - the same length of time as for litigation cases. The Wye Clinic will comply with Data Protection legislation and General Data Protection Regulations in relation to complaint handling, recording, storing, and archiving.

Suggestions

Suggestions can be made verbally or in writing using all the feedback and communication channels at The Wye Clinic (You said, We did cards, Client participation or other engagement groups, direct to The Wye Clinic). These are usually made by Clients or users seeking to improve The Wye Clinic, meet needs or respond to changes and trends.

Suggestions are not complaints. However, they will be recorded, reviewed and actioned to prevent any risk of a future complaint in relation to the suggestion made. Suggestions will be managed in the same way as other feedback and informal complaints and included in reports to Practice meetings together with other feedback.

Compliments

Receiving compliments via any Practice feedback or ad hoc voluntary method is an opportunity to celebrate and recognise success. The Wye Clinic will ensure:

- All compliments are shared with members of the Practice Team formally or informally
- Compliments will be anonymised, or permission sought from the Client or representative before being published, put on display or shared via communication channels
- Numbers of compliments received are logged as with complaints and other feedback via the Clinic register
- Verbal positive feedback from Clients and users will be recorded and shared. The Client or representative can be asked if their compliments can be reproduced on a named basis with their consent, or anonymously
- Compliments, together with complaints, suggestions and other feedback, will be taken as a standing agenda item at relevant meetings

Audit and Evaluation

The Wye Clinic will record, monitor, review and analyse all complaints and other feedback received about the service as part of the Clinics continuous improvement cycle to identify and inform performance, effectiveness, quality, safety and trends. The Wye Clinic will investigate or explore what has been received and act on the findings that emerge.

The Wye Clinic will:

- Share themes and trends with the Clinic Team and relevant external stakeholders
- Carry out and submit complaints reviews to statutory bodies as required
- Review complaints, compliments and other feedback received, together with the outputs and outcomes from the management process, as a standing agenda item at Clinic meetings
- Ensure that staff members are trained to deal with complaints, compliments, suggestion and feedback and understand the complaints procedure so that they can advise complainants with accuracy

Annual Complaints Return

The Wye Clinic will report all written complaints to the board of directors. The data collection refers to written complaints received between 1 April and 31 March each year. The Wye Clinic will collect information about the data which must be reported including:

- Complaints brought forward (from the previous period)
- New complaints
- Total complaints resolved
- Number of complaints upheld
- Number of complaints partially upheld
- Number of complaints not upheld
- Total carried forward
- Age (the number of complainants in each age group)

- Complainant (the number of new complainants in each complainant type group e.g. Client, parent, carer)
- Service area (e.g. Outpatients)
- Subject area (e.g. appointment availability or length, clinical treatment errors, confidentiality breach,
- Staff Group (admin staff, visiting consultant, nurse)