

COMPLAINTS POLICY



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COMPLAINTS POLICY

Regulator

Healthcare Improvement Scotland is the regulator for independent healthcare services across Scotland and can accept complaints at any time from a complainant.

Contact details are:

Complaints can be made to:
Programme Manager
Independent Healthcare Services Team
Healthcare Improvement Scotland
Gyle Square
1 South Gyle Crescent
Edinburgh
EH12 9EB
Tel: 0131 623 4342 (10am-2pm, Monday to Friday)
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Policy Statement

Everyone has the right to expect a positive experience and a good treatment outcome. In the event of concern or complaint, patients have a right to be listened to and to be treated with respect. Service providers should manage complaints properly so customers' concerns are dealt with appropriately. Good complaint handling matters because it is an important way of ensuring customers receive the service they are entitled to expect. Complaints are a valuable source of feedback; they provide an audit trail and can be an early warning of failures in service delivery. When handled well, complaints provide an opportunity to improve service and reputation.

Aims & Objectives

- We aim to provide a service that meets the needs of our patients and we strive for a high standard of care;

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- We welcome suggestions from patients and from our clinicians and staff about the safety and quality of service, treatment and care we provide;
- We are committed to an effective and fair complaints system; and
- We support a culture of openness and willingness to learn from incidents, including complaints.

Complaints Policy

- Patients are encouraged to provide suggestions, compliments, concerns and complaints and we offer a range of ways to do it.
- Patients are encouraged to discuss any concerns about treatment and service with their treating clinician [or alternate], or they can complete our customer feedback form.
- Clinicians and staff can also use the feedback form to record any concerns and complaints about the quality of service or care to customers.
- All complainants are treated with respect, sensitivity and confidentiality.
- All complaints are handled without prejudice or assumptions about how minor or serious they are. The emphasis is on resolving the problem.
- Patients and staff can make complaints on a confidential basis or anonymously if they wish, and be assured that their identity will be protected.
- Patients, clinicians and staff will not to be discriminated against or suffer any unjust adverse consequences as a result of making a complaint about standards of care and service.

Managing Complaints

- The sole practitioner is expected to encourage patients to provide feedback about the service, including complaints, concerns, suggestions and compliments.
- The sole practitioner is expected to attempt resolution of complaints and concerns at the point of service, wherever possible and within the scope of their role and responsibility.

Resolution

The process of resolving the problem will include:

- an expression of regret to the consumer for any harm or distress suffered;
- an explanation or information about what is known, without speculating or blaming others; considering the problem and the outcome the consumer is seeking and proposing a solution; and confirming that the patient is satisfied with the proposed solution.

If the problem is resolved, the sole practitioner is expected to complete the 'Suggestion for Improvement' form to record feedback from patients.

If the Complaint is Not Resolved

Complaints that are not resolved at the point of service, or that are received in writing and require follow up, are regarded as formal complaints. If the complaint is not resolved at the point of service, the sole practitioner is expected to provide the complainant with the formal complaints policy. The sole practitioner will then coordinate a resolution of formal complaints.

Responsibilities

- Dr Jodie Fulton is responsible for coordinating investigation and resolution of formal complaints, conducting risk assessments, liaising with complainants, maintaining a register of complaints and other feedback, providing regular reports on informal and formal complaints, and monitoring the performance of the complaints policy and procedure.
- Dr Jodie Fulton is responsible for a proactive approach to receiving feedback from patients. Furthermore she is responsible for the investigation and review of complaints and follow up action for serious complaints, or where complaints result in recommendations for change in policy or procedures.

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Dr Jodie Futon is responsible for;

- Ensuring appropriate action is taken to resolve individual complaints;
- Acting on recommendations for improvement arising from complaints;
- Ensuring there is meaningful reporting on trends in complaints;
- Ensuring compliance and review of the complaints management policy;
- Notifications to insurers; and
- Consultation with professional registration boards, and others where necessary.

Clinician Training

Dr Jodie Fulton will be appropriately trained to manage complaints competently. Regular reviews are conducted by the Dr Jodie Fulton to check understanding of the complaints process among clinicians and staff.

Promoting Feedback

Information is provided about the complaints policy in a variety of ways, including;

- On our website;
- Through our patient feedback brochure;
- Publicity about the service;
- Posters in the clinic;

Risk Assessment

After receiving a formal complaint, Dr Jodie Fulton reviews the issues to decide what action should be taken, consistent with the risk management procedure.

Assessing Resolution Options

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Formal complaints are normally resolved by direct negotiation with the complainant, but some complaints are better resolved with the assistance of an alternative disputes resolution provider.

The sole practitioner will sign post the complainant to an appropriate external body if;

- There is a serious question about the adequacy and safety of a health practitioner;
- The complaint raises complex issues that require external expertise.
- The complaint cannot be resolved internally to the patients satisfaction.

Timeframes

- Formal complaints are acknowledged in writing or in person within 48 hours.
- The acknowledgment provides contact details for the person who is handling the complaint, how the complaint will be dealt with and how long it is expected to take.
- If a complaint raises issues that require notification or consultation with an external body, the notification or consultation will occur within three days of those issues being identified.
- Formal complaints are investigated and resolved within 7-30 days.
- If the complaint is not resolved within 30 days, the complainant will be provided with an update.

Records and Privacy

- The sole practitioner maintains a complaints and patient feedback register, with records of informal feedback (Suggestions for improvement and patient feedback forms) and formal complaints.
- Personal information in individual complaints is kept confidential and is only made available to those who need it to deal with the complaint.
- Complainants are given notice about how their personal information is likely to be used during the investigation of a complaint.
- Individual complaints files are kept in a secure filing cabinet in the clinic.

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- Patients are provided with access to their medical records [in accordance with the confidentiality policy]. Others requesting access to a patients' medical records as part of resolving a complaint are provided with access only if the patient has provided authorisation [in accordance with the confidentiality policy].

Open Disclosure and Fairness

Complainants are initially provided with an explanation of what happened, based on the known facts. At the conclusion of an inquiry or investigation, the complainant is provided with all established facts, the causal factors contributing to the incident and any recommendations to improve the service, and the reasons for these decisions.

Investigation and Resolution

The clinician carries out investigations of complaints to identify what happened, the underlying causes of the complaint and preventative strategies. Information is gathered from:

- Listening to the complainant's views;
- Reviewing medical records and other records; and
- Reviewing relevant policies, standards or Guidelines.

Reporting and Recording Complaints

The sole practitioner will prepare annual reports on the number and type of complaints, the outcomes of complaints, recommendations for change and any subsequent action that has been taken.

Information about trends in complaints and how individual complaints are resolved is routinely reviewed as part of reflecting on the performance of the service and opportunities for improvement.

An annual quality improvement report is published that includes information on:

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- The number and main types of complaints received, common outcomes and how complaints have resulted in changes;
- How complaints were managed—how the complaints system was promoted, how long it took to resolve complaints (and whether this is consistent with the policy) and whether complainants and staff were satisfied with the process and outcomes; and
- The results of the annual patient satisfaction survey.
- The service promotes changes it has made as a result of patient complaints and suggestions in its general publicity.

Monitoring and Evaluation

The sole practitioner continuously monitors the amount of time taken to resolve complaints, whether recommended changes have been acted on and whether satisfactory outcomes have been achieved.