

Complaints, Suggestions and Compliments Policy and Procedure

Purpose

- This policy aims to enable Total Dentalcare to establish and operate systems for identifying, receiving, recording, handling and responding to complaints. As a result of following these procedures Total Dentalcare will investigate and take necessary proportionate action in response to any failure identified by a complainant or investigation. We will ensure that:
 - Patients know how to complain, and that their comments and complaints are listened to and acted on effectively;
 - Patients know that they will not be discriminated against for making a complaint;
 - Patients feel confident and comfortable in voicing their complaints and concerns;
 - Complaints are treated as learning opportunities and viewed as an opportunity to improve care.

Accountability

- The Registered Provider must establish and operate an effective and accessible complaints system. The Registered Manager and/or Complaints Manager (or Lead) should ensure that practice policies are followed, records kept, significant event analysis completed, and all audit, review and reporting procedures are followed. They also should ensure that staff training on complaints management is included in new staff inductions and that team training is regularly refreshed (see Complaints Lead Job Description).

Scope

- Registered Provider.
- Registered Manager and/or Complaints Lead.
- Patients.
- Relatives/Guardians, where appropriate.
- Other professionals outside agencies.
- All employees.

Policy

- It is the policy of this practice to ensure that:
 - There is a clear complaints procedure found in Appendix 1 in this policy, which is publicised to patients in the public areas of the practice and given along with the complaints acknowledgement letter.
 - The Practice Manager and/or Complaints Lead have responsibility for collating, responding and investigating complaints;
 - The Registered or nominated Complaints Manager has responsibility for ensuring the team has induction training followed up with regular updates in complaints handling;
 - The Registered or nominated Complaints Manager has responsibility for ensuring the complaints procedure is carried out correctly;
 - The procedure makes it clear that complaints will be dealt with respectfully, and without prejudice;
 - Complaints can be made in a form that takes into account all aspects of diversity;
 - Patients are kept informed of the timescale and at each stage of the handling of a complaint;
 - The procedure makes it clear what they should do if they are not happy with the result of a complaint. Contact details for the relevant commissioning body such as NHS England or a local CCG and PALS service should be on display;
 - Complaints raised by third parties, or family members, raise consent and confidentiality issues. In these cases, written authority is normally required from the Patient to include others in the sharing of information. If the Patient lacks capacity, an independent representative should be involved;
 - If it becomes clear that litigation, or the intent, has started then the complaints procedure

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- may be terminated;
- The Practice will cooperate with any further investigation by the relevant commissioning body or any involvement by a recognised organisation such as PALS;
- When treatment is made under referral, or treatment is transferred to another provider, Patients are made aware of the complaints system worked by all providers as far as possible.
- Consent and confidentiality must not be compromised during the complaints process unless there are professional or statutory obligations that make this necessary, such as safeguarding.

Procedures

- To meet these policy requirements the practice will observe the following procedures:

Identifying and Receiving Complaints

- Patients may raise concerns to any member of staff, verbally or in writing.
- They will be directed to the Practice Manager or Complaints Lead to hear them, or to address a written concern.
- In all cases an acknowledgement will be raised in writing and provided to the complainant within three working days, together with a copy of the Complaints Procedure if this has not been obtained before.
- The reply will give an estimate of the time required to investigate the complaint and reply again, which would normally be within ten working days and no later than twenty days.
- A written response, including the result of investigation, will be issued to the Patient at that time. If this is not possible, the Patient will be informed in writing why, and a new time frame issued.
- Written documentation is retained.
- Patients are informed of the address of the relevant commissioning body, PALS, Health Ombudsman and the GDC should they wish further information or address.
- All complaints are recorded on a complaints record sheet. Regular review of complaints records will assist the Management team in identifying any trends.
- All complaints will be acknowledged in writing within 3 working days.
- Complainants will be replied to within 10 working days of the complaint arising or we will give an estimate of the time required to investigate the complaint and the complainant will be given the opportunity to agree an alternative timescale if needed.
- The response will substantiate or not substantiate all points made and give a detailed outcome response with all actions to be taken to resolve issues that have been raised.

Investigating the Complaint

- Investigations and outcomes will be recorded on the complaints form, adding additional sheets as required.
- Complaints will be investigated in the first instance by Practice Manager and/or Complaints Lead, and referred up the chain of management as necessary to reach a satisfactory outcome for the complainant. The Registered Manager will become aware of the matters dealt with by other persons by way of the regular review of the file. The Registered Manager will take corrective action if it is felt during this review that complaints are not being appropriately referred up the line of management.
- The person investigating the complaint should gather the information or evidence necessary to fully understand the complainant's concerns. This may include reviewing additional records or speaking to any witnesses.

Recording the Complaint

- All employees are warned that written complaints recording rules must be complied with, and

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those records held where they are freely available to supervisors and managers. Any attempt to conceal a complaint may give rise to formal disciplinary action.

- The complainant will be requested to examine the written records of the complaint and sign to indicate agreement with the outcome.
- Records must be kept of all complaints, including those for which no actions were considered necessary after a full and fair investigation.
- In the event of a continued disagreement which cannot be resolved internally, the complainant will be advised to approach an appropriate external authority, such as the CQC, funding authorities such as Social Services or NHS, an independent advocacy service or the local government Ombudsman.
- The completed complaints form will then be handed to the Registered Manager nominated Complaints Lead for permanent filing, in the complaints file.
- The Management Meeting will periodically (recommended every three months) review all complaints and significant event analysis carried out since the previous review, in order to identify trends and matters which may have appeared to be relatively minor at the time, but which indicate a deeper problem.
- The services action plan should be updated to include all actions to be taken to resolve any requirements or recommendations made following any investigation.
- The records are kept and provided to CQC at any time that they may ask for them.

Complaints Analysis - Following a full and fair investigation

- The Registered Manager and/or Complaints Lead will conduct a significant event analysis (SEA) for each complaint received.
- Findings from the SEA will be presented at a policy review meeting to make recommendations to improve services.
- A full report of the SEA findings along with recommendations to prevent recurrences will be presented to the Registered Provider and after full consideration of the recommendations agreed, relevant policy changes will be made and the team updated.
- Measures taken to improve services will be reviewed on an ongoing basis to ensure that improvements have been maintained.

Duty of Candour

- If the complaint is a notifiable incident, as per the Duty of Candour Policy and Procedure, we shall follow that procedure as indicated. The Duty of Candour Policy and Procedure is located in the Administration section of your QCS System.

Staff Training

- Total Dentalcare will ensure that every team member is familiar with the practice complaints procedure.
- We will provide initial training and regular updates to ensure staff can deal with patients concerns and complaints, and know how to apologise and offer practical solutions.

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Key Contacts

Care Quality Commission (CQC)

National Correspondence
Citygate, Gallowgate
Newcastle upon Tyne NE1 4PA
Tel: 03000 616161
Fax: 03000 616171

Clinical Commissioning Group (for Patient funded by the Clinical Commissioning Group)

South Kent Coast CCG Council Offices

White Cliffs Business Park Whitfield,
Dover Kent, CT16 3PJ
E-mail: southkentcoast.ccg@nhs.net
Tel: 03000 424700

The Local Government Ombudsman

PO Box 4771
Coventry CV4 0EH
Tel: 0845 602 1983 or 024 7682 1960
Fax: 024 7682 0001
advice@lgo.org.uk

Independent Advocacy Services

Kent Health Trainers Health Trainer Service
Trinity House, 110-120 Upper Pemberton
Eureka Business Park
Ashford, Kent, TN25 4AZ
Tel: 0800 849 4000 (options 3)
E-mail: kcht.healthtrainers@nhs.net

Support Line

Tel: 01708 765200
E-mail: info@supportline.org.uk
Web: www.supportline.org.uk

Appendix 1

Total Dentalcare takes complaints very seriously and try to ensure that all our patients as pleased with their experience of our service. When patients complain, they are dealt with courteously and promptly so that the matter is resolved as quickly as possible. The procedure is based on these objectives.

Our aim is to react to complaints in the way in which we would want our complaint about a service to be handled. We learn from every mistake that we make and we respond to patients' concerns in a caring and sensitive way.

1. The persons responsible for dealing with any complaint about the service that we provide are the Registered Manger and the Operating Officer.
2. If a patient complains by telephone or in person, we will listen to their complaint and offer to refer him or her to the registered manager immediately. If the registered manager is not available at the time, then the patient will be told when they will be able to talk to them and arrangements will be made for this to happen. The member of staff will make a written record of the complaint; passing it on to the registered manager. If we cannot arrange this within a reasonable period or if the patient does not wish to wait to discuss the matter, arrangements will be made for someone else to deal with it.
3. If the patient complains in writing or by e-mail it will be passed in immediately to the registered manager.
4. If a complaint is about any aspect if clinical care or associated charges it will normally be referred to the dentist concerned, unless the patient does not want this happen.
5. We will acknowledge the patient's complaint in writing and enclose a copy of this code of practice as soon as possible, normally within three working days. We will inform the patient about how the complaint will be handled and the likely time that the investigation will take to be completed. If the patient does not wish to discuss the complaint, we will still inform them of the expected timescales for completing the process.
6. We will seek to investigate the complaint speedily and efficiently and we will keep the patient regularly informed, as far as is reasonably practicable, as to the progress of the investigation. Investigations will normally be completed within three months (but usually much sooner).
7. When we have completed our investigation, we will provide the patient with a full written report. The report will include an explanation of how the complaint has been considered, the conclusions reached in respect of each specific part of the complaint, details of any necessary remedial action and whether the practice is satisfied with any action it has already taken or will be taking as a result of the complaint.
8. Proper and comprehensive records are kept of any complaint received as well as any actions taken to improve services as a consequence of a complaint.
9. If patients are not satisfied with the result or our procedure then a complaint may be referred to:
 - NHS England. Email: England.contactus@nhs.net Telephone: 0300 311 2233
 - Independent Complaints Advocacy Service (ICAS). Email: southeast.icas@seap.org.uk
Telephone: 0300 343 5710 for independent advice and support
 - Parliamentary and Health Service Ombudsman, Millbank Tower, Millbank, London, SW1P 4QP. Telephone: 0345 015 4033 Website: www.ombudsman.org.uk
 - The General Dental Council, 37 Wimpole Street, London, W1M 8DQ (Telephone: 0845 222 4141) website: www.gdc-uk.org the dentists' registration body for complaints about professional misconduct
 - For Private Dental Treatment you can complain to the Dental Complaints Service, who provides free, independent Services.
Dental Complaints Services, Stephenson House, 2 Cherry Orchard Road, Croydon, CR0 6BA
Tel: 0845 612 0540, Web: <http://www.dentalcomplaints.org.uk>, Email: info@dentalcomplaints.org.uk