

### 1.0 Objective:

Pimlico Health @ The Marven is committed to providing high quality healthcare and services to patients. We are aware that there may be occasions where we do not achieve this, and therefore we offer the opportunity for our patients to formally raise their “**Feedback**” complaint or concern about the service. In the details below this will highlight how they can do so.

### 2.0 Reference/Source:

- We operate a complaints procedure as part of the NHS system for dealing with complaints. The practice complaints procedure meets national criteria.
- The independent Complaints Advocacy Service (ICAS)
- Health Service Ombudsman
- London Primary Care Complaints Consortium (LPCCC)
- CQC Complaints

### 3.0 Details:

#### 3.1 Decide how serious the complaint is:

- **Low Unsatisfactory service** or experience, not directly related to care. No impact or risk to provision of care. Unsatisfactory service or experience related to care, usually a single resolvable issue. **To be handled by a Front of House Manager/Senior Receptionist.**
- **Minimal impact** and relative minimal risk to the provision of care or the service. **No real risk of litigation. To be handled by the Deputy Practice Manager**
- **Medium Service** or experience below reasonable expectations in several ways, but not causing lasting problems. Has potential to impact on service provision.
  - **Justifiable complaint - Some potential for litigation.**
  - **To be handled by the Business Manager**
- **High Significant issues** regarding standards, quality of care, and safeguarding of, or denial of rights. Complaints with clear quality assurance or risk management issues that may cause lasting problems for the organisation, and so require investigation.
  - **Possibility of litigation and adverse local publicity.**
  - **Serious issues** that may cause long-term damage, such as grossly substandard care, professional misconduct or death. Will require immediate and in-depth investigation. May involve serious safety issues. A high probability of litigation and strong possibility of **adverse national publicity. To be handled by the Business Manager and Partners.**

#### 3.2 How complaints are received: Verbally

If a patient calls or walks into the practice to give feedback and the reception staff realise they may require further assistance in handling it, they must advise the patient that they can arrange to meet the deputy manager to verbally raise their complaint – this can be completed via the Systmone Meet the manager forums.

Staff will be trained to handle complaints, and handling difficult patients, in difficult circumstances, but from time to time the nature of the complaint may mean they can only handle it so far. That said we expect our staff to handle verbal feedback from patients in the following way:

### 3.2.1 Projecting a professional image

- Always in the first instance, try to defuse the situation and complaint by seeking a solution with the patient (this may be through asking them appropriate questions).
- Be friendly but not familiar – smile and express warmth. You can convey body language in your voice.
- Acknowledge the person, establish identities.
- Focus on the purpose of what the person is saying. Don't do other things at the same time.
- Make sure you understand the person and that the person understands you.
- Take responsibility for actions or messages – make sure you do what you say you will do.

### 3.2.2 Giving a good impression on the telephone

Telephone conversations are very different from face-to-face contact. How we dress, our body language and our surroundings all play an important role in how people respond to us. On the telephone, all the other person has to go by is our tone of voice and what we say. Your attitude is conveyed in your voice over the phone just as effectively as when you have face-to-face contact

- Answer promptly and identify yourself and place of work to the caller.
- Show interest in what the caller says and readiness to solve any problem or query they have.
- Always be aware of confidentiality if you are in a public or a semi-public area.

### 3.2.3 Handling difficult people

Sometimes you have to exercise particular skill and tact with people who, for one reason or another, are difficult. Here are some guidelines for dealing with difficult people.

- Let them talk
- Acknowledge their problem
- Provide reassurance
- Focus on the problem – ask questions, it helps to dilute the emotions
- Offer solutions in a helpful and friendly manner
- Don't take abuse personally

You must not put the patient through to the Business manager on the phone, as there is no way to minute the dialog between patient and manager.

You can advise the patient to fill out a feedback/complaints form, and send this to the Business manager, or they can be advised to write a letter/email to the deputy/Business manager who will address their complaint. This must only be done via the generic email address of [Pimlico.Marven@nhs.net](mailto:Pimlico.Marven@nhs.net)

Once the patient books an appointment through Systmone with the Deputy/Business manager to raise their complaint, this will also be documented this on the Feedback Form, to which the patient will sign and date to confirm their attendance at the meeting and show agreement to what has been noted.

### 3.3 How complaints are received: Written

Any member of staff in receipt of a written complaint (whether by form, letter, or incoming email, should read the nature of the complaint, refer to 3.1 of this policy and decide who the complaint needs to go to in the first instance.

Once the Business manager has taken the patients feedback (depending on the nature/severity of the complaint) this will be raised at the partners meeting, and forms part of the Agenda. This takes place monthly.

An outcome will be discussed and agreed, and the Business manager or designated partner will write to the patient with explanation or resolution to their feedback.

The written responses to all complaints forms part of the guidance from NHSE national standards. [Practice Response Template Final.pdf](#)

All feedback and response to such will be compiled together with a summary each month as to the nature of feedback (analysing if there are trends/common themes to the nature of the feedback) and this will be located in the Business Managers office.

Feedback statistics will be shared with staff, to raise awareness of matters that they may be able to affect, and impact change with. It is also good practice to share such feedback on practice website and waiting room displays.

A patient can expect a response of acknowledgement to their complaint/feedback within 3 working days, as this will allow the Business/Deputy manager enough time to discuss and prepare the response. Although a response to an investigation can take a further 7 days+. Complaints made about a clinician may result in the clinician wishing to write a response to the patient alongside the Business manager.

### 3.4 Internal Investigation & Outcome

A patient has a maximum of 12 months to make a formal complaint of an incident that may have occurred, or where they believe there has been malpractice.

Each complaint will be treated individually and given the level of due diligence required to resolve the matter and reduce the likelihood of the occurrence.

Therefore the Business manager will internally investigate some complaints in more detail than others (dependant on the nature of the complaint) and the severity of it, both to the business, reputation of the practice or that of the Dr/Staff involved. An investigation may require time to compile due to possibilities such as interviewing employees, or taking statements etc.

All investigations will then be presented to the partners for discussion, and follow up action(s) if required.

The outcomes of an internal investigation will then be fed back the patient by way of letter form the Business manager or a designated partner.

### 3.5 External intervention

The independent Complaints Advocacy Service (ICAS) on 0845 337 3061, can provide free impartial support when you are making a complaint. They can help to draft or write a letter,

can arrange interpreting or can accompany you to a meeting. The website is: [www.pohwer.net](http://www.pohwer.net)

If you prefer, you can phone or write to the complaints department at the Primary care Trust, Their staff will aim to try to sort out complaints and can make enquiries on your behalf.

If you are not satisfied with the way we have dealt with your complaint, you can contact the Health Service Ombudsman on 0845 015 4033. The website is: [www.ombudsman.org.uk](http://www.ombudsman.org.uk)

### 3.6 Principles of good complaints handling

- Getting it right
- Being customer focused
- Being open and accountable
- Acting fairly and proportionately
- Putting things right
- Seeking continuous improvement

NHSE have produced a quick guide to assist practices in appropriate handling of complaints. This tick list on the following page will be used in complaints direct to practice or via NHS Complaints team.

The Practice response is on headed paper?	<input type="checkbox"/>
The Practice response is addressed to the complainant	<input type="checkbox"/>
Does the response apologise that the patient had reason to complain	<input type="checkbox"/>
The practice has responded to <u>all</u> issues in the complaint <u>not</u> just issues highlighted by NHS England	<input type="checkbox"/>
Has the investigation identified where matters have gone wrong. Does the Practice response	<input type="checkbox"/>
<ul style="list-style-type: none"> <li>✓ Identify errors</li> <li>✓ offer an apology</li> <li>✓ State what measures have been put in place to rectify and prevent reoccurrence</li> </ul>	<input type="checkbox"/>
Where action has been taken supporting evidence has been included	<input type="checkbox"/>
Has the complainant been offered a meeting to discuss concerns raised	Yes/No
The practice response signpost to the Ombudsman	<input type="checkbox"/>
The completed Action Plan has been returned to NHS England	<input type="checkbox"/>
The final response has been signed by the responsible person or person authorised to act on his or her behalf	<input type="checkbox"/>
Please state whether the complaint has been	

Upheld

Not upheld

NB If any or all of a complaint is well founded then it should be recorded as "upheld"

Note: The Ombudsman adopts this principle in their adjudications.

Has the practice response letter been viewed by the Medical Indemnity?

Yes/No

### 3.7 Informing Patient of complaints policy

Information and or reference to this policy should be displayed in the following ways:

- Practice Website
- Practice Leaflet
- Practice Application form
- Notice boards in waiting areas & reception areas

**Feedback Form (Can be completed by Business Manager/Deputy Manager or Patient)**

a) Patients name (including title):	b) Patients Address:
c) Telephone:	Email:
Mobile:	Preferred method and time of contact:
d) If consent is require has consent been obtained?	
e) Date:	Time of meeting <i>if held</i> (from-to):
f) Brief Summary of Feedback (may use additional sheet if required)	
g) what issues would you like to be investigated further:	
<ol style="list-style-type: none"> <li>1.</li> <li>2.</li> <li>3.</li> <li>4.</li> <li>5.</li> </ol>	
h) Is there anything specific you are seeking from raising such feedback:	
i) What timescale do you require for a response:	
j) How would you like us to respond following investigation of your feedback: Please circle Meeting Phone Call Letter from Manager/Partner	
k) Are you informed about ICAS? Are you informed about other support agencies? If yes please state which:	
l) Patient Sign:	I agree to the details noted on this form and that it is my honest feedback.
m) Manager Sign:	Date given to Manager:

**Investigation form (To be completed by Business Manager)**

a) Practice Name:		
b) Patient Name:		
c) Investigation carried out by:		
d) Date of Incident		e) Date complaint was raised
e) Ethnicity of Patient (if relates to the nature of the complaint)		f) Ethnicity of staff (if relates to the nature of the complaint)
g) Are supporting notes attached (letter or 8.0 feedback form)	Yes	No (if no why?)
h) If complaint is about employee have they been advised?	Yes	No
i) Has this complaint been shared with partners	Yes	No (if no why?)
j) Is there any other evidence you have gathered in this investigation?	Yes	No
k) If you have answered yes to question j) please state what supporting evidence has been collected.		
l) Specific actions Patient wishes to be addressed		
m) Has patient been advised investigation is underway?	Yes	No (if no why?)
n) Agreed Outcomes/Action	By Whom	By When
o) Does the investigation require external input?	Yes	No
p) If yes please confirm which organisation.		
q) Please state the reasons for this decision.		