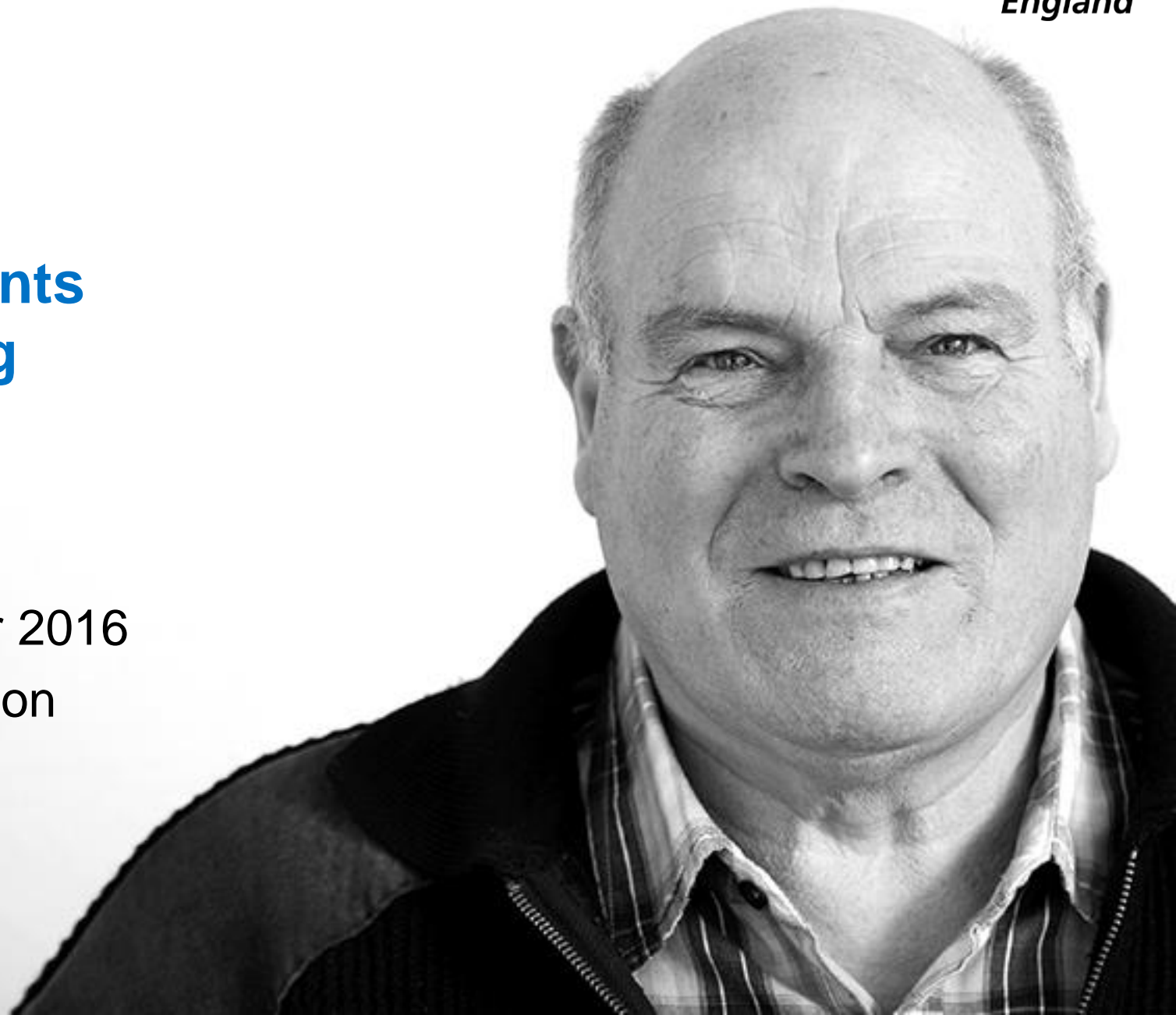


Complaints Handling

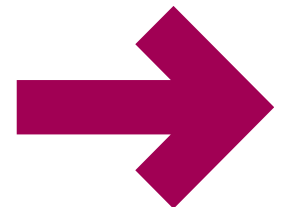
December 2016

Kevin Holton



NHS England Complaints Remit

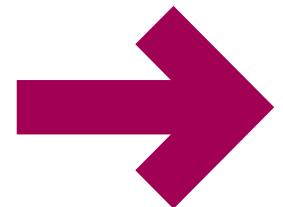
1. Ensure that services commissioned by NHS England adhere to contractual and legislative frameworks and improvements are made in the handling and reporting of complaints
2. Develop NHS England's internal customer contact arrangements, including handling of, and learning from, complaints.
3. Ensure that NHS England works with stakeholders to deliver improvements in complaints handling, and joint learning programmes are developed to inform the policy process and operational delivery.



The Regulations

Local Authority Social Services and NHS Complaints (England) Regulations 2009:

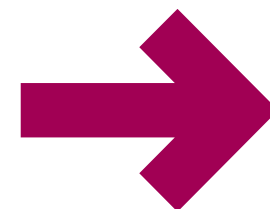
- Acknowledge complaints within 3 working days
- Offer to discuss handling and agree time frame
- Investigate properly
- Include details of PHSO when responding
- Responsible Person (Partner, Director etc)
- Complaints Manager (can be same as RP but could be PM etc)
- Requirement to report on annual basis as part of the KO41(b) process



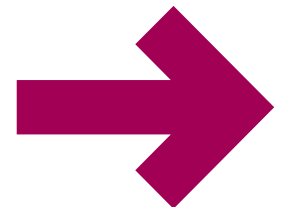
KO41b annual returns

- Return rates increased significantly from around 43% in 2013/14 to around 85% from dentists to HSCIC
- Data fields changed for this year, so HSCIC will be able to do more in-depth analysis of returns by subject area
- Dental complaints make up just over 10% of total number of complaints reported in primary care
- Around 85% of complaints are made directly to the provider in primary care
- Our KO41b return for 15/16 shows:

		Medical	Dental	Admin	Other	Total
2015-16	NHS England	3,510	941	434	14	4,899



NHS England's handling of complaints and concerns

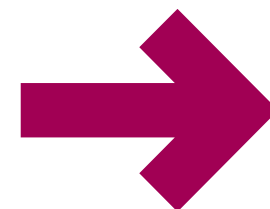


Structure in NHS England - Customer Contact Centre

- Established April 2013 - national call centre for all contacts, and if complaints they are triaged to regional teams
- In 2015-16, we received 198,100 contacts. Of these around:
 - 70% were general enquiries
 - 25% complaints or concerns; and
 - 5% FOI requests

Complaints handling – NHS England

- The handling of complaints within the NHS changed on 1 April 2013 to align with the new structure of the NHS England.
- In most case complaints should be made directly to the practice.
- If the complainant does not wish to complain directly to the practice then the complaint can be raised with NHS England as commissioner of the service. This includes complaints relating to primary care (Dental, GP, pharmacy; optician, specialised commissioning and some independent funding requests)



Current Complaints Process

National Customer Contact Centre (NCCC)

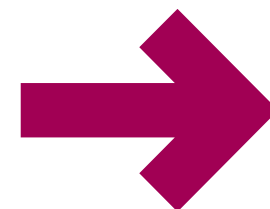
- Complainant contacts or sends complaint to the National Customer Contact Centre. If they can resolve informally they will

IF NOT:

- The complaint is then allocated to a local complaints team

Local complaints team

- Local complaints team will review the complaint and consider if informal resolution is appropriate. In all cases they will acknowledge the complaint and request verbal or written consent to forward the complaint for investigation.
- Once consent is received the complaint is sent on to the relevant independent contractor/care provider for investigation



Current Complaints Process

Service provider

- The service provider will draft a response letter and include any other documentation relevant to the complaint (medical/admin records) and send to their indemnity org if appropriate.
- This final draft is then sent back to the complaints team to review and approve
- If there are any concerns around the quality of the practice response the complaints team will liaise with the service provider

Local Complaints Team

- Following receipt of the practice response. The complaints team will arrange for a review by independent medical/dental professional, or primary care contract team.
- If the review reveals gaps in response or the quality needs improvement the complaints team will send this back to the practice for amendment.
- NHS England will prepare a letter including independent clinical review and/or primary care contract team comments forming conclusions/opinion on complaint and any recommendations/learning for improvement or action as appropriate.
- The draft responses are sent to the Clinical Reviewer or Head of Primary Care to approve before it is sent to Director for Commissioning Operations for sign off.
- Once signed, local complaints team attach all documents to the national database and send final response to the complainant with copy to practice

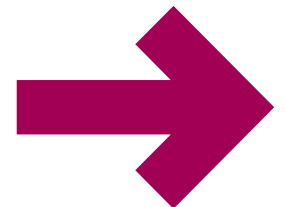


Subject of Complaints received- Dentistry

NHS England Region	Communication /Attitude	Premises	Practice/ Surgery Management	Practice admin	Clinical	Other	Total
South- Wessex	5	0	12	3	33	1	54
South- South West	18	0	13	1	17	4	53
South- South East	11	0	9	5	45	1	71
South- South Central	2	0	9	2	26	2	41
London	19	0	18	1	46	2	86
M&E- North Mids	12	0	25	8	51	3	99
M&E- West Mids	10	0	11	6	44	1	72
M&E- Central Mids	4	0	14	6	49	5	78
M&E- East	16	1	15	0	56	1	89
North- Yorks and Humber	11	1	31	6	66	7	122
North- Cumbria and North East	5	0	8	2	18	1	34
North- Cheshire and Mersey	6	0	6	0	13	3	28
North- Greater Manchester	4	0	13	2	36	4	59
North- Lancashire	9	0	17	0	27	3	56

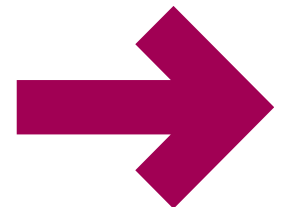
Major issues on contacts and complaints

- Issues we have seen people complain about in dentistry include:
 - Visibility of price list
 - Attitude of practice staff
 - Lack of clarity around anticipated cost
 - Lack of availability of initial and emergency appointments



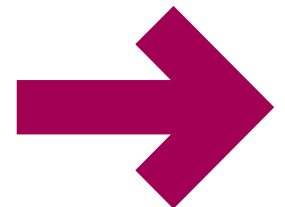
Complaints response issues

- Quality and timeliness of response from dentist
- Failure to properly investigate
- No discussion/statement from all staff involved
- No reference to guidelines/best practice
- Lack of apology/empathy
- Poor presentation
- No evidence of learning/sharing complaint more widely

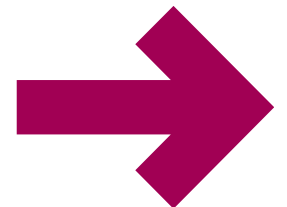


Quality Framework for NHS England

- Created to improve both consistency and quality
- Initially focussed on a set of templates which can be used in full or in part – devised with and by regional colleagues
- Peer review – in development (have we added value, would I want to receive this response, what did we do well/could do better) – working with advocacy providers & Healthwatch
- Learning reports – to share good practice and outcomes
- Training and support for complaints staff
- Aligned with My Expectations



What does good look like?



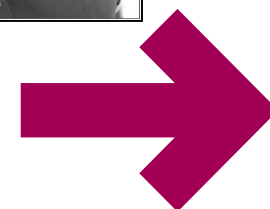
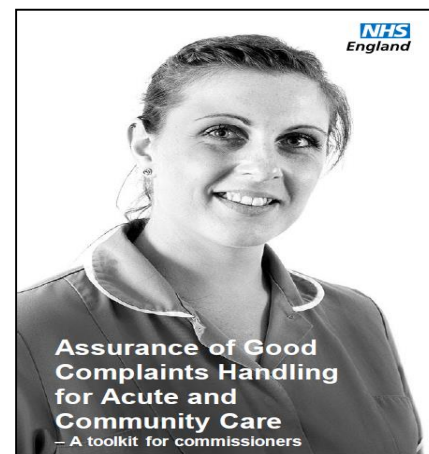
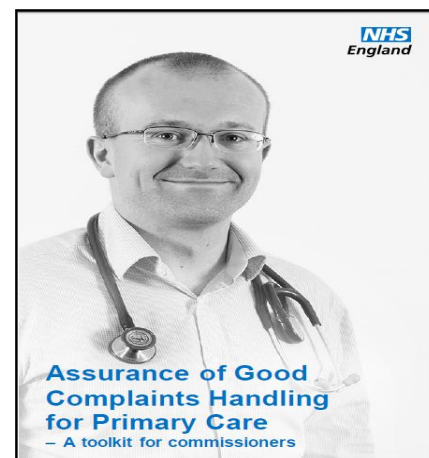
My Expectations

A user-led vision for raising concerns and complaints

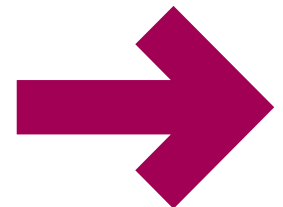


Commissioning Toolkits

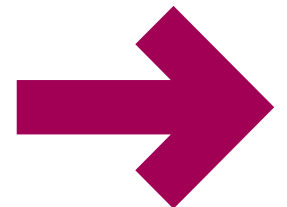
- One for Primary Care –
one for Acute Care for
CCGs



- We want to make sure that the complaints process is clear for patients, regulators, commissioners and providers alike so are producing a statement with CQC and Healthwatch on dental complaints.

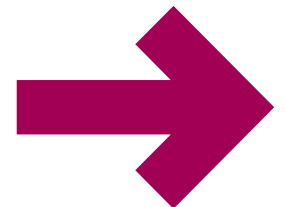


Other organisations involvement



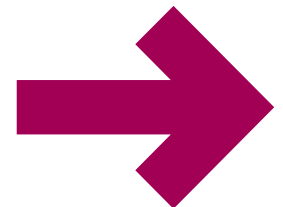
CQC – key line of enquiry - responsiveness

- There is a complaints system in place, which is publicised, accessible, understood by staff and people who use the service.
- There is openness and transparency in how complaints are dealt with.
- Information is provided about the steps people can take if they are not satisfied with the findings or outcome once the complaint has been responded to.
- People report that they know how to complain, that the system is easy to use and staff treat them compassionately and give help and support they need to make a complaint.



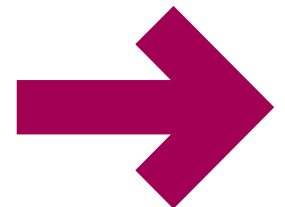
CQC – KLOE – well led

- The provider has systems in place to support communication about the quality and safety of services and what actions have been taken as a result of concerns, complaints and compliments.
- Candour, openness, honesty and transparency and challenges to poor practice are the norm

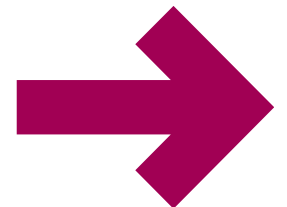


GDC Standards

- Make sure there is an effective complaints procedure...that it is available...and that you follow it
- Respect a patient's right to complain (patients' care should not be compromised because they complain)
- Prompt (but not at expense of quality) and constructive response

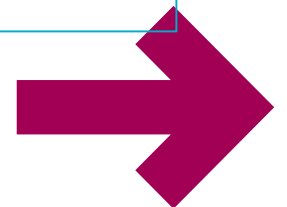


Learning from complaints and other feedback

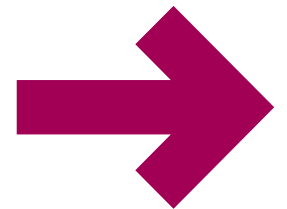


Learning from complaints and other forms of feedback

- Establish mechanisms for systematic learning from complaints, to help inform the process (how complaints are managed), policy development and service improvement - using intelligence gained from complaints information and other forms of feedback and data

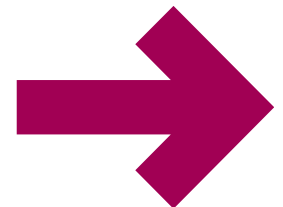


How we are supporting practices



Training and Support

- A series of workshops have been arranged during 2016/17 with the DPS covering:
 - Good customer service
 - What is in the NHS Regulations
 - The stages of the complaints process and who might be involved
 - Planning an investigation
 - Exploring various approaches to an investigation
 - Coordinating a response when more than one person is the subject of the complaint
 - How to deal with a complaint when the clinician is no longer at the practice
 - The elements of a good response
 - Learning from a complaint
 - The role of the Ombudsman (PHSO)
 - The Dental Complaints Service (DCS)
 - GDC Expectations
 - CQC Expectations
- By Spring 2017 we will have delivered training to over 700 dentists and practice staff.



And:

- NHS England supports the National Complaints Managers Forum
- Regular newsletters and information sent via email
- Twice yearly events
- Questions can be posed by group members
- Would welcome primary care and dental practices to the group.....please email dalejohno@googlemail.com and you will be added to the network

