

# COMPLIANTS POLICY

IT IS THE RESPONSIBILITY OF ALL USERS OF THIS POLICY TO ENSURE THAT THE CORRECT VERSION IS BEING USED

This policy has been approved by the undersigned and will be reviewed on an annual basis. In case of any queries or questions in relation to this policy please contact the Chief Operating Officer (COO) (Sophie McCracken) or CEO (Jane Lambert)

Does this document meet the requirements of the Equality Act 2010 in relation to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation?

Yes

<b>Policy reference &amp; version:</b>	V4		
<b>Author:</b>	Clara Travers / Helen Hodges		
<b>Position:</b>	Director of Services and Director of Clinical Standards		
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<b>Author signature:</b>	C.Travers	<b>Date:</b>	12.01.2023
<b>Approved by:</b>	Sophie McCracken		
<b>Position:</b>	Chief Operating Officer		
<b>Signature:</b>	S.McCracken	<b>Date:</b>	12.01.2023

## REVISION HISTORY

Date	Version No	Revised by	Reason for Update Sections Affected Description	Approved by	Date of next Review
12.01.2023	V4	Helen Hodges	Annual review and introducing – first point resolution.	Sophie McCracken	12.01.2023

## 1. Introduction

At ECG we are committed to providing the best quality customer service to all our clients and prospective clients and welcome comments about our service so that we may continually improve.

This Policy sets out our approach to resolving complaints, the process we will follow and the standards we provide.

## 2. Purpose

We want to help you resolve any concerns as quickly as possible and will progress any issues on the following basis:

- We will make sure the earliest possible resolution is sought to any concern or complaint.
- We treat as a complaint any expression of dissatisfaction with our service or products even if it has not been positioned as a formal complaint.
- We will listen to your concerns, treat them seriously, and learn from them so that we can continuously improve our service.
- A complaint is an expression of dissatisfaction, and will be treated with respect and fairness with due regard to confidentiality and sensitive situations.

### Our policy covers complaints about:

- The standard of service we provide
- The behaviour of our staff
- Any action or lack of action by staff affecting an individual or group our complaints policy does not cover:
- Matters that have already been fully investigated through this complaints procedure
- Anonymous complaints

## 3. Standards for Handling Complaints

- Complaints, although rare, are treated seriously, whether they are made by letter, phone or email
- You will be treated with courtesy and fairness and we ask that you approach our staff with the same respect
- We will listen to any concerns fully and will do all that we can to minimise the stress of the process by keeping you up to date at every stage of your complaint.
- We will deal with your complaint promptly with an acknowledgement being sent by email within 3 working days
- We aim to complete our investigations in a timely manner. Once the issue has been investigated and resolved, we will send a full reply detailing the outcomes.
- In line with our ISO 9001 Quality standard, we maintain a report of all complaints received, communication and resolution in order to demonstrate

compliance, and to ensure we improve our processes and procedures where possible to avoid future similar issues

- We will reflect upon and try to learn from each complaint so that we can continue to pursue high standards of practice.

#### 4. Procedure

##### 4.1 Complaints about ECG Training

Concerns, compliments or complaints to be made to the Director of Services either verbally or in writing.

By email [bookings@ecgtraining.co.uk](mailto:bookings@ecgtraining.co.uk)

By post ECG The Gatehouse Bradwell Abbey Alston Drive Milton Keynes MK13 9AP

By Phone 0845 423 8993

- 4.1.1 If having contacted ECG with a complaint you remain dissatisfied, you can ask to have your complaint reviewed by our Chief Operating Officer, Sophie McCracken at [sophie@ecgtraining.co.uk](mailto:sophie@ecgtraining.co.uk)
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##### 4.2 Complaints about Clinical Services and MakeWell Clinic

Concerns, compliments or complaints to be made to the Director of Clinical Operations either verbally or in writing.

By email [bookings@wemakewell.co.uk](mailto:bookings@wemakewell.co.uk)

By post ECG The Gatehouse Bradwell Abbey Alston Drive Milton Keynes MK13 9AP

By phone 01908 731293

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##### 4.3 Complaints about Professional Support

Concerns, compliments or complaints to be made to the Director of Pharmacy Services either verbally or in writing.

By email [carolynne@ecgtraining.co.uk](mailto:carolynne@ecgtraining.co.uk)

By post ECG The Gatehouse Bradwell Abbey Alston Drive Milton Keynes MK13 9AP

By phone 0845 423 899

- 4.3.1 If having contacted MakeWell with a complaint, you remain dissatisfied, you can ask to have your complaint reviewed by the CEO, Jane Lambert, at [Jane@ecgtraining.co.uk](mailto:Jane@ecgtraining.co.uk)
- 4.3.2 If you are not satisfied that your complaint or has not been addressed as you would want, you can contact:
- 4.3.3 The Ombudsman: [www.ombudsman.org.uk](http://www.ombudsman.org.uk) or call them on 0345 015 4033
- 4.3.4 The Care Quality Commission (CQC): Find out more about how to [complain about a service or provider](#). If you are not able to use their [online form](#), you can contact them on the telephone: 03000 616161 (lines are open Monday to Friday, 08.30am to 5.30pm, excluding bank holidays) or email: [enquiries@cqc.org.uk](mailto:enquiries@cqc.org.uk)
- 4.3.5 The Nursing and Midwifery Council (NMC): If you are reporting a concern about someone on the NMC register, or telephone on 020 7637 7181 (lines are open Monday to Friday, 08:00–17:45 excluding bank holidays) or email: [newreferrals@nmc-uk.org](mailto:newreferrals@nmc-uk.org) (you will receive an automatic email response to confirm receipt and an acknowledgement in writing, with your unique case reference number, within seven days)
- 4.3.6 The Health and Care Professions Council (HCPC): Telephone on 0800 328 4218 or email: [ftp@hcpc-uk.org](mailto:ftp@hcpc-uk.org)
- 4 Information given to clients about how to feed back a concern, compliment or complaint**
- 5.1 Written information on the concerns, compliments and complaints procedure will be available on the ECG and MakeWell websites.
- 5.2 Clients will be assured that they will not be discriminated against for providing a concern, compliment or complaint.
- 5.3 Clients can also access information about the data we hold about them via our websites.
- 5 Receiving and recording a concern, compliment or complaint**
- 6.1 Concerns, compliments or complaints can be made by a client, a former client, or someone acting on a client's behalf.
- 6.2 All received concerns, compliments or complaints, whether written or verbal, will be recorded.
- 6.3 Recorded details will include:
- The date and time the feedback was received
  - A description of the feedback
  - Details of the investigation carried out
  - Any actions taken, and whether or not a complaint (if applicable) was upheld

- 6.4 Where a complaint is received anonymously, ECG / MakeWell will carry out an investigation as far as it reasonably can, depending on the content of the complaint.
- 6.5 ECG / MakeWell will maintain a complete record of all concerns, compliments or complaints received and copies of all related correspondence. These records will be kept separately from any healthcare records.

## 7.0 Handling a complaint

- 7.1 All complaints received will be treated in the strictest confidence.
- 7.2 All complaints, written or verbal, will be investigated.

### 7.1 First point of resolution

- 7.1.1 Where possible, ECG/Makewell will attempt to resolve the complaint to the client's satisfaction at the first point of contact, ideally on the same day that the complaint is received.
- 7.1.2 Where the complaint is resolved at the first opportunity the appropriate Head of Department or Director will be informed within one working day so that they may review the outcome of the complaint.

### 7.2 Investigating Complaints

- 7.2.1 Where a complaint needs further investigation, complainants will receive an email acknowledgement of their complaint within three working days
- 7.2.2 The acknowledgement will include the name and contact details of the person investigating the complaint and advise the complainant of the next steps and expected timescales.
- 7.2.3 ECG/MakeWell will arrange a discussion with the complainant, as far as this is reasonable, in order to discuss the manner in which the complaint is to be handled and how the issue(s) might be resolved.
- 7.2.4 During this discussion, the following information will be obtained and/or provided:
- How the person wishes to be kept informed, e.g. in writing by letter or email, by telephone or through an agreed third party representative or advocate
  - Where appropriate, confirm with the person if they give their consent to access healthcare or training records for the purposes of investigating the complaint
  - Confirm if the person has any disabilities that need to be taken into account during the investigation
  - Advise the person that they can have a representative to support them through the complaints process (with provision of an interpreter if needed)
  - Seek to establish what the complainant is looking for as an outcome to the complaint's investigation, e.g. an apology, explanation, replacement course or appointment, reimbursement of costs and agree a plan of action.
  - In the event that the complainant does not wish to have a discussion, ECG / Makewell will continue to investigate the complaint and will write to the complainant with the conclusion.

### 7.3 Responding to Complaints

- 7.3.1 ECG/MakeWell/ will carry out an investigation of the nature of the complaint and provide a full written response to the complainant within twenty (20) working days of the complaint being received.
- 7.3.2 If a full response cannot be given within twenty (20) working days of receiving the complaint, ECG/MakeWell will write to the complainant to explain the reason for the delay.
- 7.3.3 If a complainant is not satisfied after a complaint has been investigated, ECG/MakeWell will provide further information to the complainant in terms of potentially escalating the complaint to an external body depending on the nature of the complaint.
- 7.3.4 ECG/MakeWell will co-operate with any independent review of a complaint that has been escalated.

### 8.0 Receiving and handling unreasonable complaints

- 8.1 In situations where the person making the complaint can become aggressive or unreasonable, ECG/MakeWell will instigate appropriate actions from the list below and will advise the complainant accordingly:
- Ensure contact is being overseen by an appropriate senior member of staff who will act as the single point of contact and make it clear to the complainant that other members of staff will be unable to help them
  - Ask that they make contact in only one way, appropriate to their needs, e.g. in writing
  - Place a time limit on any contact
  - Restrict the number of calls or meetings during a specified period
  - Ensure that a witness will be involved in each contact
  - Refuse to register repeated complaints about the same issue
  - Do not respond to correspondence regarding a matter that has already been closed; only acknowledge it
  - Explain that ECG/MakeWell will not respond to correspondence that is abusive
  - Make contact through a third person such as an independent advocate (where appropriate)
  - When using any of these approaches to manage contact with unreasonable or aggressive people, provide an explanation of what is occurring and why
  - Maintain a detailed, dated and timed, record of each contact with the complainant during the ongoing relationship

### 9.0 Feedback and Learning

Head of Departments and Directors will provide timely, anonymised feedback to their teams arising from complaints to support learning and continuous improvement.

### 10. Annual review and audit of comments and complaints

ECG/MakeWell will audit all concerns, compliments and complaints quarterly and produce an annual report to the Senior Management Team. This will include:

- The number of complaints received, as well as concerns and compliments
- The issues that these complaints raised in terms of any trends or areas of risk that might need to be addressed
- Whether complaints have been upheld
- Improvements or changes to the service that were made in adherence to the quality improvement policy

## 11.0 References and Further Reading

- Being open – communicating patient safety incidents with patients and their carers (NPSA, 2009).
- Data Protection Act 1998  
<http://www.legislation.gov.uk/ukpga/1998/29/contents>
- Department of Health guidance *Complaints in the NHS*  
<https://www.gov.uk/government/publications/nhs-hospitals-complaintssystem-review>
- Listening, improving, responding: a guide to better customer care (DH, 2009)
- MIND – complaining about health and social care  
<http://www.mind.org.uk/information-support/legal-rights/complainingabout-health-and-social-care/>
- NHS Constitution  
<https://www.gov.uk/government/publications/the-nhs-constitution-for-england>
- NHS Litigation Authority guidance about complaints
- Principles of Good Complaint Handling (PHSO, 2009)  
<http://www.ombudsman.org.uk/reports-and-consultations/reports/health>
- Public Interest Disclosure Act 1998  
<http://www.legislation.gov.uk/ukpga/1998/23/contents>