

Compliments and Complaints procedure



Further contact information please email:
complaints@easytests.co.uk

1. Introduction

1.1 Easy Testing LTD T/A Easy Medical Centre recognises the importance of the patients overall experience when requesting testing services via our organisation. We aim to respond, listen and learn from all concerns raised. The background and information obtained from compliments & complaints is used to help improve and develop our services, whilst recognising and acknowledging good standards of practice. Service users are encouraged to express complaints, concerns, and views, both positive and negative, about the treatment and services they receive, in the knowledge that:

- They will be heard and taken seriously.
- They will receive a speedy and effective response by a member of staff who is appropriately qualified and trained to respond.
- Appropriate action will be taken, and feedback shared with the patient.
- Lessons will be learned and disseminated to staff accordingly.
- There will be no adverse effects on their care or that of their families.

Your health matters to us, and is at the heart of our service delivery.

1.2 This policy sets out the process for complaints management and the standards that complainants and service users can expect.

It also explains how complaints will be reviewed, monitored and how lessons learned will be implemented and improve future services as a result. The policy aims to provide a fair and effective procedure for the management of complaints and ensure that complainants not only feel fully engaged in the process but also are actively involved in matters, which relate to the care they have received.

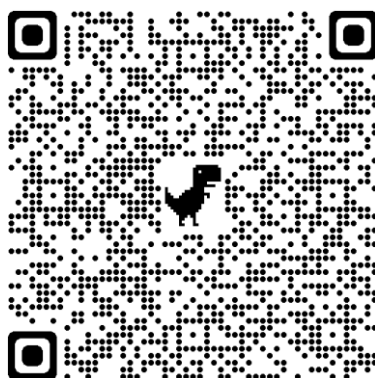
1.3 Ensuring good practice in the handling of complaints is one way in which Easy Testing LTD T/A Easy Medical Centre can help to improve quality for their patients, and future patients. Monitoring trends and patterns in complaints and concerns highlighted by patients about our services, facilitates early detection of systemic problems.

The learning from complaints helps us to continually improve the services we provide.

Complaints are essential in identifying the users' perspective of the services provided and can act as an early indicator of a system issue, or a quality and

safety issue which may be putting patients at risk. Appropriate trend analysis and triangulation of other factors such as reported incidents and patient experience surveys, combined with complaints, concerns and enquiries provide a valuable and powerful insight into our health care services which may require improvements.

- 1.4 We also welcome insight into patient experiences, which have been well received, via our QR codes, which we currently share on Google Review and may be seen as good practice or exceptional standards of service. This informs the future patients of clinical or operational practice which can be acquired and also informs the ICB or CQC along with other areas of the healthcare community, to drive up quality of care within our local communities.



- 1.5 Easy testing Ltd subscribes to CEDR the independent sector complaints adjudication service.

2. Purpose and Principles

- 2.1 This policy sets out the framework that Easy Testing LTD T/A Easy Medical Centre will follow when addressing concerns, feedback, or complaints made by service users (or their nominated representatives).
- 2.2 The policy incorporates the requirements of the Local Authority Social Services, the CQC and the rights of patients and service users.
- 2.3 The policy will ensure that the complaints services provided by Easy Testing LTD T/A Easy Medical Centre, observes Good practice standards of Complaints Handling.

Getting it right - Easy Testing Ltd will act reasonably and fairly in making decisions, with quality and effective services through competent, trained staff, and where things go wrong handling and investigating complaints well and taking steps to remedy any injustice and hardship suffered and avoid any recurrence.

Being patient focused - the delivery of our services are accessible services and advice; providing clear and understandable information about services and what patients can expect from our services. We are committed to doing what we say we will do or if we can't explain why; behaving helpfully; being sensitive to individual needs and flexible in response to circumstances, coordinating with other public authorities and governing bodies to promptly identify and acknowledge failures or poor service and apologise.

Openness, honesty and accountability - This approach to the management of complaints by handling information as openly as the law allows while respecting the privacy of personal and confidential information; providing clear, accurate, complete, relevant, and timely information and advice; being open and truthful about the reasons for its decisions and actions; maintaining reliable and useable records; and taking responsibility for the actions of our staff and others acting on our behalf.

Acting fairly and proportionately – by listening to our patients; treating people equally, impartially, fairly and consistently; managing conflicts of interest appropriately to avoid prejudicing decisions or actions; ensuring any consequences or remedies applied are fair, reasonable and proportionate to the management of the complaint. Ensuring that complainants are not discriminated against in relation to any on going services, and that staff as well as patients are treated fairly and respected throughout the process.

Putting things right – when mistakes happen by acknowledging them, apologising, explaining what went wrong, and putting things right quickly and effectively. Where possible, putting things back to the position they would have been in if nothing had gone wrong, in such cases we provide, this could be a free repeated test.

Seeking continuous improvement – by reviewing policies and procedures regularly and seeking and using feedback to improve delivery and performance;

capturing and reviewing the lessons learned from complaints to develop services; and if necessary escalation the reporting on complaints handling performance for independent advice and or outcomes.

2.4 UK regulations and principles from many health care providers all place the emphasis on putting the patient at the heart of the handling of their complaint to ensure an inclusive investigative process which is conducted fairly and effectively and is outcomes driven. Here at Easy Testing LTD T/A Easy Medical Centre, we believe in this approach.

3. Easy Testing LTD T/A Easy Medical Centre – How to make a complaint - Obligations and responsibilities.

3.1 Easy Testing LTD T/A Easy Medical Centre complaints procedure provides for complaints to initially be managed at the source of the complaint. We would encourage initial contact to raise any concern to be emailed into our designated complaints email address: complaints@easytests.co.uk

Stage 1 - local level – staff complete an incident report GHS03 (Appendix 1) for escalation and a response is then issued to the complainant within the first 7 working days. The complainant will receive email contact from a member of the service team advising you that your complaint has been received.

Our team may ask further questions to ensure they have all relevant information.

We will investigate, establish root causes and respond with outcomes within a 28 working day period.

You then have the right to discuss the outcomes with the manager and contact details of the manager will be provided within the 28-day response.

Stage 2 - If the patient is dissatisfied with the stage 1 outcomes the Manager can re-review the investigation outcomes and feedback to the patient.

- Identify and address any issues, advising complainants of the actions being taken as part of the formal process.
- The manager will take an inclusive approach toward the patient complaint and arrange a meeting date.

- Stage 2 should be undertaken no later than 10 working days following the stage 1 outcome, or upon agreeing a date with the patient. Whichever one meets the patient's needs.

Stage 3 – Escalation to CEDR (Centre for Effective Dispute Resolution).

3.2 At Easy Testing LTD T/A Easy Medical Centre the designated 'Responsible Person' for the purposes of ensuring compliance with the Local Authority Social Services and NHS (England) Complaints Regulations 2009 is the registered manager. They are, therefore, responsible for ensuring there is an effective system for the management, investigation and resolution of complaints/concerns and requests for advice within the organisation, and for ensuring that Easy testing ltd complies with the relevant regulations. In addition, the manager has the responsibility for ensuring that the information relating to, and gathered from, complaints/concerns and requests for advice to improve services, to inform the complaints process, and to assure itself that the services provided are safe and of a quality that the service user expects.

3.3 The manager has responsibility for preparing and keeping under review the arrangements for handling complaints, which includes the production of the Complaints Policy.

3.4 Any changes to the policy require the approval of the director and the manager and must be displayed in the quality management record (this must include the revision number)

3.5 All operational staff at Easy Testing LTD T/A Easy Medical Centre have a responsibility for the local level day-to-day management of complaints. The staff are required to initially complete an incident report and escalate the reporting of this to the manager.

4. What is a complaint?

4.1 One definition of a complaint is "an expression of dissatisfaction that requires a response". Clearly this is an open definition, and it is not intended that every minor concern should warrant a full-scale complaints investigation. However, Easy Testing LTD T/A Easy Medical Centre will always establish by asking the complainant, how they would like their concern dealt with, whether informally through the local level approach or formally using the managers intervention.

4.2 The spirit of this complaints policy is to have a user led system for raising concerns and complaints. Our main aim at Easy Testing LTD T/A Easy Medical Centre is to set out what good outcomes look like from the point of view of the person who has made a complaint. We aim to provide a thorough and well-communicated response to the complainant.

4.3 All issues can be dealt with in a flexible manner, which is appropriate to their nature. Sometimes a complaint can be resolved quickly to the complainant's satisfaction. Whenever there is a specific statement of intent on the part of the person that they wish their concerns to be dealt with as a formal complaint, they will be treated as such. Anybody who is dissatisfied with the initial response to a matter which has been dealt with as a problem-solving issue or at a local level stage 1, will be advised of their right to pursue the matter further through the stage 2 procedure.

5. Investigation and Time Limits for Response

5.1 Easy Testing LTD T/A Easy Medical Centre aims to resolve all complaints managed under stage 1 and stage 2 within 45 working days. Stage 3 concerns may take up to 60 working days.

5.2 If Easy Testing LTD T/A Easy Medical Centre has not provided a response within 45 days, we will write to the complainant to explain the reasons for the delay and outline when they can expect to receive the response. At the same time, we will notify the complainant of their right to approach the CQC without waiting for local resolution to be completed. This timescale may be subject to variation, depending upon the complexity of the complaint investigation and if the focus of the complaint is within the direct provision of the direct care provided by easy testing ltd, or if the delay is presented due to the diagnostic outcomes of the test.

5.3 The response should include a full explanation of the issues and findings, details of any actions taken to prevent a recurrence of the incident.

5.4 If and Where multiple commissioners of services are involved in a complaint, we will ensure there is agreement on which commissioning organisation leads the investigation.

6. Exceptions

6.1 The following are excluded from the scope of this policy:

- Complaints and grievances raised by members of staff, relating to their contract of employment.
- Complaints by third party organisations about contracts arranged or regarding commissioning arrangements.
- Complaints that have previously been investigated under these or previous regulations and where no significant additional information is supplied.
- A complaint which is being or has been investigated by CEDR
- Complaints about what levels private treatment is offered.
- A case where an out of court settlement has previously been received.
- Any allegations of fraud, bribery or financial misconduct raised via the complaints process will be forwarded on to CEDR for Specialist or independent consideration.

6.2 Where a complaint (verbal or written) raises concerns, suspicions or allegations of abuse or neglect of children or adult, it will immediately be brought to the attention of the local authority safeguarding links and not via this policy

The most appropriate course of action may include:

- Report through Cheshire East safeguarding processes
- If Police involvement is necessary

6.3 In some cases safeguarding processes may take precedent over the complaints process. Where safeguarding processes are invoked and this impacts on the timing of the complaint response, re-negotiation regarding timescales may be necessary to allow for the completion of the safeguarding investigation first. In all cases an agreement will be reached with the individual parties involved as to what process will provide the material response, or what elements of the complaint can/will be answered or resolved outside of the safeguarding process.

7. How do I escalate my complaint to CEDR?

7.1 To contact the Centre for Effective Dispute Resolution (CEDR) please email: applications@cedr.com

Alternatively you can call and leave a message. They aim to return your call during office hours, Monday to Friday 9:00am – 5:00pm.

Phone: 0207 520 3800

Alternatively, if you need to post any correspondence please use the following details:

Centre for Effective Dispute Resolution
CEDR, 3rd Floor
100 St. Paul's Churchyard
London
EC4M 8BU

7.2 Remember to check the complaints process for how Easy Testing LTD T/A Easy Medical Centre manage stage 1 and stage 2, before contacting CEDR, who provide the stage 3 process.

8. Who Can Complain?

8.1 In general terms, a complaint can be made by:

- Anyone who is receiving, or who has received treatment or services provided by Easy Testing LTD T/A Easy Medical Centre
- Anyone who is affected by or likely to be affected by an action, procedure or decision of Easy Testing staff.

8.2 If a person is unable to make a complaint, then someone can act on their behalf.

A representative may make a complaint on behalf of an eligible person who is not able to make the complaint themselves. This includes where the person:

- Is unable by reason of physical incapacity or lack of capacity within the meaning of the Mental Capacity Act 2005.
- Has requested the representative to act on his or her behalf and provided written consent.
- Is a child *

*Note A person with parental responsibility can make a complaint on behalf of a child if you judge that the child does not have sufficient understanding of what is involved. You do not need the child's consent in these circumstances (or the consent of the other parent/guardian).

At Easy Testing LTD T/A Easy Medical Centre it is a requirement and is good practice for us to verbally explain the process to the child in a way that they can understand. This includes telling them that information they may need to know about the procedure they are undergoing. If the child has sufficient maturity and understanding they can either make the complaint themselves or consent to a representative making the complaint on their behalf.

Medical professionals need to consider Gillick competency if a young person under the age of 16 wishes to raise a complaint without their parents' or carers' consent or, in some cases, knowledge.

8.3 When the representative makes a complaint on behalf of a child we should consider:

- Must not consider the complaint unless it is satisfied that there are reasonable grounds for the complaint being made by the representative instead of the child:
- If it is not satisfied, must notify the representative in writing, and state the reason for its decision.

8.4 Easy Testing LTD T/A Easy Medical Centre must establish within the local level stage 1 of the complaint procedure who is making the complaint and the relationship to the patient. All consensual information needs to be acquired prior to treatment during the consent and appointment process.

8.5 Easy Testing LTD T/A Easy Medical Centre will not accept any complaint 6 months past treatment dates.

9. Consent

9.1 In some cases Easy Testing LTD T/A Easy Medical Centre may require consent from the patient, or a person authorised to act on their behalf. The reason for this request is to comply with the General Data Protection Regulation 2018 (GDPR) and Data Protection Act 2018,. Should we need to re-approach our laboratory to aid supporting investigative information to conclude and support the investigation of the complaint. The main purposes of these Acts and guidance are to respect and protect the individual's rights and ensure that any information about the person concerned is not disclosed without their consent.

9.2 Care will be always taken throughout the complaints process to ensure that any information disclosed about the patient is confined to that which is relevant to

the investigation of the complaint, and only disclosed to those people who have a demonstrable need to know it for the purpose of investigating the complaint. The investigation will begin when written consent is received either from the patient or their representative.

9.3 Easy Testing LTD T/A Easy Medical Centre will require the following information to support consent and investigation; this data will also be the primary data on the incident report GHS03 (Appendix1)

- Patient's name
- Patient's address
- Patient's contact number
- GP Surgery (in the event of safeguarding concern)
- Patient's date of birth
- Representative details (if applicable PARENTS NAME ETC)
- Representative address (if applicable)
- The nature of the complaint.

10. Handling Complaints

10.1 All complaints received via our support email: complaints@easytests.co.uk are logged and will receive an acknowledgement within 7 working days of receipt. Easy Testing LTD T/A Easy Medical Centre's service team will then discuss how the complaint will be handled and clarify the level of formality directly with the patient to establish how they wish to pursue. We will clarify what the core of the complaint is and what outcome the complainant expects. We will advise of the timescales involved.

10.2 Our intention is that complaints are dealt with flexibly; with the aim of achieving the desired outcome if that is possible, as early as possible. A meeting can be offered as part of the resolution process at stage 2.

11. Appeals Process

11.1 Should a complainant remain dissatisfied following receipt of the manager's response, they have a right to escalate to a stage 3 with support from CEDR. Additional timescales for resolution will apply.

11.2 In cases where the investigating officer/manager at stage 2 requires a second opinion, to further support to resolve the complaint they may approach the appropriate Director of the organisation for their view.

All outcomes will include this level of information.

12. Learning from Complaints

12.1 The aim of any complaint investigation is to try to understand what went wrong and what actions, if any, should be taken as a result to prevent the incident re-occurring. Lessons learned from complaints are discussed at management level.

The purpose of the discussion is to use the information to:

- Ensure any common themes are visible to the team.
- Make informed decisions about where service improvements can be made.
- Monitor progress against any action plans.
- Reduce the risk of a similar patient experience being repeated.

13. Duty of Candor

13.1 The duty of candour is a legal requirement for healthcare professionals to be open and honest with patients when something goes wrong with their care.

13.2 The duty of candour requires healthcare professionals to:

- Acknowledge mistakes
- Apologise
- Explain what happened
- Be transparent and honest
- Support staff to come forward when mistakes happen

When it applies

The duty of candour applies when:

- Care has caused or may have contributed to harm, or death
- The harm is moderate or severe
- The incident is a “notifiable safety incident”

Who it applies to

The duty of candour applies to:

- NHS trusts and foundation trusts
- All other health and social care providers registered with the Care Quality Commission (CQC)
- All healthcare professionals.

13.3 Easy Testing LTD T/A Easy Medical Centre has a responsibility to act in an open and honest manner Regulation 20 of the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.