

Patient Complaints Policy and Procedure (Kent)

2023

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1.0 Introduction

BCNO (BCOM and ESO) is committed to providing a high standard of care to all patients who attend our clinics. However, on occasion, we may not meet an individual's level of satisfaction and if you are concerned about the care or service you have received from us, we would like to know. We take complaints very seriously and continually strive to improve the quality and standards of our service.

If you do not wish to complain but have a comment or suggestion on our service, please complete a patient feedback form located at clinic reception and on the [website](#). This can then be emailed or placed in the comments box in clinic reception. If you wish to email a comment or suggestion, please email: clinicleaders.eso@bcnogroup.ac.uk

NHS guidelines in handling patient complaints have informed the BCNO complaints procedure.

2.0 Aim

The procedure aims to listen, discuss your concerns, and take appropriate action. The procedure is based on the following:

- Concerns are treated seriously and fairly
- The complaint will be investigated promptly
- All complaints are treated confidentiality, though the Head of Clinical Education will be informed as good practice.
- Information will only be shared with staff and students that need to know
- The process will be fair to all
- The complainant will be treated equally, and any ongoing provision of care will be unaffected by the investigation
- The BCNO Quality and Planning Committee will review a summary of complaints annually and identify areas that need review for the benefit of all stakeholders.
- BCNO has a whistleblowing policy which can be found [here](#).

3.0 What is a complaint?

A complaint is defined as a 'formal expression of dissatisfaction about the service provided' by a patient, carer, or relative. Complaints should normally be made within six months of the event or six months after discovering the problem, provided it is within 12 months of the initial event. At the discretion of senior clinical staff, this timeframe can be extended if considered necessary (there are mitigating circumstances). If a complaint is placed later than the timeframe, though it will be treated appropriately, it must be noted that it may be challenging to investigate the incident.

4.0 Who can complain?

- Carer or relative. If a relative raises a complaint, the patient must have provided written consent unless the complainant is the parent or guardian of a child aged 16 or under. In the case of an adult who cannot provide informed consent, next of kin or lasting power of attorney (for health and wellbeing) can consent on the patient's behalf.
- If a complaint is raised concerning a deceased patient, then this should be made by a suitable representative, such as a close family member.
- There are exceptions: Individuals making a complaint on behalf of those who cannot provide written consent.

For those pursuing legal action against BCNO concerning the complaint, the process will be suspended pending the completion of any legal process.

- The complaint is registered outside the recognised timeframe without any mitigation circumstances.

5.0 How to complain

5.1 Step 1

Tell us about your concern and we will do our best to sort it out.

The quickest and best way to get help with your concerns is to speak directly to your practitioner, tutor, or reception staff. This can be done in person during the event, or please telephone the Clinic on ESO (Kent): 01622 685913 and tell the receptionist that you have a concern and wish to discuss this urgently. The receptionist will log your call and a senior clinic team member will call you back ASAP (usually within 24 hours). The person you speak to will want to know the full details of your concern. It may be possible to resolve the issue immediately.

Typically, all informal complaints will be logged on the informal complaint form (Appendix 1) to allow for auditing and reviewing purposes. The reception team can complete these forms if the complaint is phoned into reception.

However, this may not be the case because more information needs to be collected, notes obtained, or practitioners contacted. You will be told who will deal with your concern and how quickly you can expect a response, and, in any event, we will aim to respond to your concern within one week.

5.2 Step 2

Make a formal complaint to the Clinic Administration Manager.

If you are unhappy with the response you receive from Step 1, a formal complaint form must be completed (Appendix 2). For the formal complaint to proceed, you (the patient; or an appropriate other) must consent to the investigation. The form can be obtained from clinic reception and the website or by writing to:

**Clinic Administration Manager
European School of Osteopathy (ESO)
104 Tonbridge Road
Maidstone ME16 8SL**

Your complaint will be acknowledged in writing. Members of staff/students concerned will be informed that a formal complaint has been received. An investigating officer will be appointed to investigate the formal complaint. Documentation and statements will be collected. The Clinic will contact you at no less than weekly intervals to inform you of the progress of any investigation. A complaints committee will be formed and will consider the evidence.

The committee can make the following recommendations:

- The complaint is not upheld, and no further action is needed
- The complaint is upheld, and appropriate action is necessary
- If a complaint is related to student behaviour, the case may be referred to the Fitness to Practice for appropriate action
- When the complaint concerns staff behaviour, complaints may be referred to Human Resources for further action.
- Costs associated with the treatment may be refunded

If a hearing is needed, a friend or representation may accompany a patient. Legal representation is not considered appropriate.

You will be informed in writing of the outcome of the investigation generally within 25 working days of receiving the complaint. A decision will usually be given. However, if the complaint is complex, it may take longer to investigate, but you will be informed.

5.3 Step 3: Appeal Process

If for any reason, you are not satisfied with the outcome of Step 2, you have a right to appeal. Any appeal should be made in writing within ten working days of receipt of the Step 2 outcome, sent to:

The CEO

European School of Osteopathy,

Boxley House,

The Street, Boxley,

Maidstone.

ME14 3DZ

or via email to: ceo@bcnogroup.ac.uk

Your appeal should clearly state the reason/s for your dissatisfaction with the Step 2 outcome. The Clinic Administration Manager will provide the CEO with all the relevant documentation for review. If the appeal can't be resolved using this documentation alone, the CEO may direct that further investigation and evidence are required. This may necessitate a hearing at which the patient and/or your representative and any other persons involved may be requested to attend. The outcome of the appeal process will be communicated in writing directly to you by the CEO and normally within 25 working days of the receipt of the appeal. If any delay to this timescale is anticipated, you will be informed.

The outcome of the appeal will be:

1. The complaint is upheld.
2. The complaint is rejected.

The appeal decision is final.

5.4 Step 4: Regulatory Body

If you feel our internal clinic complaints procedure has not resolved the situation sufficiently, you may contact: the General Osteopathic Council (GOSC), the profession's regulatory body.

General Osteopathic Council

176 Tower Bridge Road

London SE1 3LU UK

0207 357 6655 Ext 224 during office hours

Email: regulation@osteopathy.org.uk

Appendices

Appendix 1: Informal patient complaint form

This form is designed to be completed when an informal complaint is made regarding care in the Clinic. Though most complaints can be completed at the time, it is helpful for BCNO to identify any problems that arise so we can review our processes and service. The staff or student dealing with the complaint must complete the form with the patient and other relevant parties.

	Complaint received by staff
Name of person completing the form	
Role at BCNO	
Date of completion of the form	
	Details of complaint
Name of complainant	
Address	
Telephone	
Email	
Relationship to patient	
	Details of the patient (if different from above)
Name of patient	
Address	
Telephone	
Email	
Date of incident	
Details of complaint/incident:	Please give as much detail as possible:

Was anything done on the spot? Or anything else that resolved the issue?	Please give details
Any further action taken?	

Has the complaint been resolved?	Yes No: if no, please refer to the Head of Clinical Education.
If no to the above. Has the complainant been informed that the information will be passed on to the relevant staff?	Yes Who was the staff informed: Date:
Does the patient require written confirmation of the informal complaint and the actions taken?	Yes No
If yes to the above. How was the complainant informed	Yes How were they informed Email Letter Date sent

Appendix 2: BCNO Patient Complaints Form – Formal

This form is designed for use if you have a complaint that cannot be resolved informally and wish to complain formally.

The details of the formal complaints process can be found within the BCNO Patient Complaints Procedure accompanying this form.

Please give as much detail as possible to help us understand and deal with your complaint efficiently.

Consent and Declaration: For the BCNO to deal appropriately with your complaint, we will need to disclose the details of it to relevant staff and students and their line managers. BCNO requires written consent from you as the patient to proceed, as we will need to share your information with those investigating and the committee deciding the outcome.

I agree that BCNO can disclose my complaint and any information I have given to relevant staff and students. I also agree that relevant staff and students can disclose relevant information regarding my case so that my complaint can be thoroughly investigated.

Signature of patient or complainant

Date

Form to be completed by the patient or representative such as Lasting Power of Attorney or next of kin

Title and full name	
Address	
Telephone number	
Email (if you have one)	
If you are complaining on behalf of a patient, please state your relationship with them	e.g., relative, carer, next of kin
	If different from above
Patients full name and title	
Address	
Telephone number	
Email	
Patient's date of birth	
Date of complaint	
Details of the complaint with as much detail as possible. Include who was involved	

	If you need more space, please use a separate sheet and tell us how many extra sheets you are adding:
Has this been discussed informally	Yes No
If yes to the above, what action was taken	Please give as much detail as possible
	If you have any other relevant information- please include them with your submission and record them here:

**How would you like
this matter resolved
to your satisfaction**

Patient consent to appoint a representative (who does not have lasting power of attorney or Nok): to be completed where possible by the patient

Please note if the patient is 16 or under, this does not need to be completed if the parent or guardian is the complainant.

If you are complaining on behalf of a patient, then you will need to get them to declare that they consent to this (if possible) and they will need to complete the declaration below:

I agree for.....(name of complainant)
to make this complaint on my behalf and agree that they may see information that is relevant to the complaint. This may include relevant medical records and other healthcare records or other information.

Name of patient	
Signature of patient	
Date	

Checklist for complainant

Has the following been included and provided:

The patient's consent for you to complain on their behalf	
The patients consent for BCNO to investigate	
Precise details on how to contact the patient and complaint if needed	
A complete and precise description of the complaint	
Additional information, if needed	
Any other relevant information	

Please return the form to the following:

For office use:

Date received	
Acknowledgment sent	
Sent to investigator	

Auditing

Policy Name:	Patients Complaints Policy and Procedure – Kent Clinic		
Policy Owner:	Patient Experience Group		
Policy Approver:	Academic Board		
Audience:	Patients; Students; Faculty; Staff; External Visitors		
Storage Location:	BCNO Website – Clinic		
Effective Date:	11.2023		
Review Date: <small>(Unless other revisions are required prior to this date)</small>	08.2024		
Version:	V1.1		
Equality Impact Assessment:	Are there any implications for a protected characteristic group as defined by the Equality Act 2010 in this policy?		
	<input type="checkbox"/> Positive Impact	<input type="checkbox"/> Negative Impact	<input checked="" type="checkbox"/> Neutral
Details:			

Contact Us

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