



SMART DENTAL
COMPLIANCE & TRAINING

**Complaints, Suggestions and
Compliments Policy**



**All in One
Management Software**

Practice Details

Name of Practice

Grayshott Dental

Name of Manager

Tasmin Bradley

Version

2.4

Policy Update Date

01-01-2024

(Date policy was updated by SDC)

Type of Policy

Mandatory

(Mandatory/Recommended)

Table of Content

Introduction	04
Purpose	04
Scope	04
Definition	04
Policy Procedure	05
Related Documents required to complete	12
– Complaints Flowchart	
– Practice leaflet with complaints procedure	
– Complaints Log	
Related CQC Key Line of Enquiry	12
Our Practice Protocol (Printable)	13



All in one management software

Complaints, Suggestions and Compliments Policy

Introduction

At Grayshott Dental we take complaints very seriously and try to ensure that all our patients are pleased with their experience of our service. When patients complain, they are dealt with courteously and promptly so that the matter is resolved as quickly as possible. This policy and procedure is based on these objectives. We learn from every mistake that we make and we respond to patients concerns in a caring and sensitive way. We have a named staff member responsible for dealing with any complaint about the service which we provide.

At Grayshott Dental we are constantly striving to improve, to provide an exceptional service. Feedback is an essential part of this, so if you have suggestions about how we could improve then please let us know. We would also appreciate any compliments about our service, as these can also be used to continue to improve and provide the best possible service to our patients.

Purpose

To ensure that Grayshott Dental has a system in place to effectively manage complaints, suggestions and compliments.

To ensure that Grayshott Dental complies with any legal requirements, regulations, guidelines and best practice.

To ensure that all complaints, compliments and suggestions are dealt with in accordance with legislative, occupational, regulatory requirements in a professional manner and within required timescales.

To have systems in place to continuously monitor and evaluate themes of complaints, suggestions and complaints to use in the development and improvement of services provided to the general public.

To meet the legal requirements of the regulated activities that Grayshott Dental is registered to provide:

- Compensations Act 2006
- Dentists Act 1984
- The Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- Human Rights Act 1998
- Mental Capacity Act 2005
- Mental Capacity Act Code of Practice
- Data Protection Act 2018
- UK GDPR

Scope

The following roles may be affected by this policy:

- All staff

The following service users may be affected by this policy:

- Patients

The following stakeholders may be affected by this policy:

- Commissioners

Definitions

Compliment

- A compliment is an expression of satisfaction about a service that the Patient has received
- Compliments are positive feedback that can be received verbally or in writing and can include expressions of praise, admiration, congratulation and encouragement

Complaint

- A complaint is an expression of dissatisfaction, disappointment or discontent. This could be in response to an act of omission, decision or act
- Complaints can be made in various ways and include:
 - Verbally
 - Electronically
 - Local feedback channels
 - Writing

Self-Funded Care

- Self-funded care is defined as care that is paid for entirely by the person receiving it. This is often termed private dental care

Professional Standards

- The General Dental Council has Professional Standards in place for the Dental Team. This applies to all Dental Care Professionals:
 - Dentists
 - Dental Nurses
 - Dental Hygienists
 - Dental Therapists
 - Orthodontic Therapists
 - Dental Technicians
 - Clinical Dental Technicians

There are 9 principles that all dental care professionals must implement and act in accordance with. All DCPs have an individual responsibility to behave professionally and follow these principles at all times.

Principles:

- Put patients' interests first
- Communicate effectively with patients
- Obtain valid consent
- Maintain and protect patients' information
- Have a clear and effective complaints procedure
- Work with colleagues in a way that is in patients' best interests
- Maintain, develop and work within your professional knowledge and skills
- Raise concerns if patients are at risk
- Make sure your personal behavior maintains patients' confidence in you and the dental profession

Serious or persistent failure to follow the guidance could see a DCP removed from the General Dental Council's Professional register and not be able to work as a dental professional.

Additional guidance documents can be located at <https://www.gdc-uk.org/> (<https://www.gdc-uk.org/>)

Vexatious Complaint

A vexatious complaint is one that is pursued, regardless of its merits, solely to harass, annoy or subdue somebody; something that is unreasonable, without foundation, frivolous, repetitive, burdensome or unwarranted

Policy Procedure

Complaints

Grayshott Dental understands complaints to be an expression of dissatisfaction or concerns requiring a response, communicated verbally, electronically, or in writing. Complaints may be made by any Patients, their families or advocates acting on their behalf, with their consent or in their best interests.

Grayshott Dental takes complaints seriously. It will aim to put things right that have gone wrong and learn lessons to avoid the problem happening again. This policy sets out the framework for how Grayshott Dental will achieve this. The detail of how the service will do this will be found in the associated procedures.

Grayshott Dental will comply with legislation, national guidelines, regulation and best practice when managing complaints and suggestions. A systematic approach will be taken with all aspects of complaints and suggestions.

Complaints or concerns by staff will be addressed via the grievance process if the complaint or concern relates to them individually, or the whistleblowing procedure where a protected disclosure is made.

Grayshott Dental understands its statutory obligations in respect of the Duty of Candour, and Professional Standards (Principles 1,2,5 and 9) and will ensure that it follows agreed policy and procedure.

Grayshott Dental will ensure that its complaints and compliments process is fair and transparent and does not discriminate directly or indirectly because of:

- Age
- Being or becoming a transsexual/transgender person
- Being married or in a civil partnership
- Being pregnant or on maternity leave
- Disability
- Race including colour, nationality, ethnic or national origin
- Religion, belief or lack of religion/belief
- Sex
- Sexual orientation

The complainant will feel free to complain without fear of reprisal and will be treated with courtesy, respect and compassion.

Grayshott Dental understands that it can be difficult to separate a complaint from a concern. Therefore, Grayshott Dental will follow this policy when any dissatisfaction arises with the service.

Grayshott Dental will protect the Patient's right to confidentiality. Grayshott Dental will ensure that alternative methods of communication are available so that the complaints and suggestions procedures are accessible for patients who experience difficulties with communication or whose first language is not English.

Staff will undertake training on how to manage complaints in line with their role and responsibilities.

A full record will be held of all complaints received, regardless of the level of seriousness and means of communication. This approach allows an open and transparent culture around raising concerns in the earliest stage to allow resolution.

Roles and Responsibilities

All Staff

It is acknowledged that all staff working within Grayshott Dental could be presented with a Patient wishing to raise a concern or complaint at any time. Therefore, staff need to be able to manage this in a sensitive, structured and timely manner. In order to do this staff will:

- Be trained on induction and as a routine measure to ensure that knowledge is embedded and refreshed around the complaint's procedure
- Have access to the complaint's procedure
- Be provided with the opportunity to reflect and learn from complaints as a means of developing and driving quality care
- Appreciate that any feedback from patients or their representatives that is of concern needs immediate resolution, where possible, to their satisfaction
- Be clearly advised that, on presentation of a complaint, swift escalation to management is necessary and purposefully withholding or concealing concerns expressed by patients or their representatives could lead to disciplinary action

Management Team at Grayshott Dental

The management team at Grayshott Dental is responsible for ensuring compliance with this policy, for regulations, for improvement planning and having arrangements in place to provide relevant reports and information regarding complaints.

Zahir Nasser is the main point of contact for the receipt, investigation and management of complaints within Grayshott Dental. However, this could be delegated to a senior member of staff within Grayshott Dental who has the experience, knowledge and competence to investigate and manage complaints.

Grayshott Dental will ensure that the procedure for raising a complaint is accessible.

Seeking Views and Engaging with Patients

Grayshott Dental will seek out opportunities to obtain feedback from patients and stakeholders. Grayshott Dental will act with sensitivity, integrity and professionalism by treating individuals who do raise a suggestion with compassion, courtesy and respect.

Consent for feedback and opinions will be required for all feedback requested from individuals. It is an individual's right to not to participate with workplace ongoing feedback requests. Permission will be sought, alongside full explanations of the aim of feedback requests to ensure that understanding is clear.

Compliments and Suggestions

Grayshott Dental welcomes compliments and suggestions and recognises their importance in celebrating and recognising the success of its service and opportunities for improvement. It will engage with a wide range of stakeholders in addition to patients to support service development and improvement. It will share feedback with its staff.

Safeguarding Concerns

Where a complaint or concern is raised that relates to a Patient being harmed or likely to be harmed, Grayshott Dental will follow the Safeguarding Policy and Procedure at Grayshott Dental in addition to the complaints procedures, seeking advice and guidance from the Safeguarding Adults Team and raising a safeguarding notification where required. Grayshott Dental will also notify the CQC in line with its statutory duty.

Raising Complaints

A complaint can be received by Grayshott Dental either verbally or in writing and can be made by:

- Patients
- Someone acting on behalf of a Patient and with their written consent, e.g., an advocate, relative, Member of Parliament
- Someone acting on behalf of a Patient who is unable to represent his or her own interests, provided this does not conflict with the Patient's right to confidentiality or a previously expressed wish of the Patient

Grayshott Dental should ensure that Patients are given information on how to make a complaint and the process once a complaint has been made, including any agreed timescales.

Time Limits for Submitting a Complaint

Complaints should be submitted within 12 months of the incident or concern arising.

The time limit, however, can and should be waived, if:

- It is still practical and possible to investigate the complaint (the records still exist and the individuals concerned are still available to be questioned, etc.) and
- The complainant can demonstrate reasonable cause for delay in making the complaint It is at the discretion of Zahir Nasser if the time limit can be set aside.

Complaints Procedure:

Step 1

When a complaint is raised to staff, staff will make an effort to resolve it immediately to the satisfaction of the complainant.

Step 2

Staff will apologise for the fact that there was the need to complain in the first instance and explain the complaints process as described in the procedure steps.

Step 3

Staff will report the complaint to the most senior member of staff on duty and the complaint will be logged.

Step 4

Formal acknowledgement of the complaint will be sent within 72 hours of receipt to the complainant and this could be via letter or email. Grayshott Dental will ensure that the out-of-hours and weekend complaints received are managed effectively

The acknowledgement will include:

- An invitation to meet and discuss the complaint
- Who will be investigating the complaint
- How the investigation will be handled - the response should state what the investigation will be focused on
- A time limit for the investigation to be concluded. This should be 28 days. However, some cases may take longer and the complainant will be made aware of this
- The complaints procedure and contact details of bodies that can be accessed in the event of dissatisfaction with the outcome of the investigation

Step 5

Following a full investigation, a response letter will be sent and this will include the following:

- A summary of the issue from the complainant's point of view
- Details of the evidence and sources consulted in order to investigate the issue fully and fairly
- A presentation of the findings for each issue clearly and concisely described
- A conclusion, stating clearly whether the issue is "upheld", "partially upheld" or "not upheld", unless it is ineligible, in which case the reason for this will be given, e.g. out of time or out of jurisdiction

- An explanation of the outcome and whether any remedial action or learning points arise from the investigation of that
- issue
- An apology where the issue is upheld and shortcomings or failings have been found
- The complainant's rights if not satisfied with the outcome to refer to the Dental Complaints Service or the General Dental Council
- A signature from Zahir Nasser or sent by email in their name

Step 6

The complaint will be closed once confirmation has been received that there is satisfaction with the outcome. In the event of dissatisfaction, Grayshott Dental will support the complainant to access further support.

Vexatious Complaints

Occasionally, Grayshott Dental may receive complaints that are vexatious in that they cause considerable disruption to the work at Grayshott Dental, disproportionate cost and time to handle and impact the wellbeing of staff (because of the way the complaint is made or because of its repetitive nature).

Grayshott Dental will ensure that it meets the requirements of the Equality Act 2010 to make 'reasonable adjustments' for disabled customers. In some circumstances, customers may have a disability that makes it difficult for them to either express themselves or communicate clearly and/or appropriately. Where there is an indication that this may be the case, Grayshott Dental will consider the needs and circumstances of the Patient or complainant in the first instance and use this information to inform any decisions that are made.

Where appropriate, Grayshott Dental will consider complaints to be vexatious but would not label an individual complainant as vexatious. Even if Grayshott Dental decides that an individual's complaint about the service is vexatious, that does not preclude that person from making a formal complaint. Grayshott Dental would still consider any such complaints in line with the usual procedures.

To help decide whether a complaint is vexatious, Grayshott Dental will consider the full history and context of interactions with the individual making the complaint and will look at both the nature of the complaint and the manner in which it is made. The particular issues that will inform a decision will include whether:

- The primary purpose and/or effect of the complaint is to disturb, disrupt and or pressurise Grayshott Dental, its staff or an individual member of staff
- The primary purpose and/or effect of the manner in which the complaint is made is to disturb, disrupt and or pressurize Grayshott Dental, its staff or an individual member of staff
- The complaint is otherwise clearly unreasonable

If at any point in the handling of a complaint, a member of staff believes it meets the criteria to be deemed vexatious, it must be referred to Zahir Nasser with a summary of why it is thought to be vexatious.

Zahir Nasser will consider the complaint, seek external advice if appropriate, and will either declare the complaint as being vexatious, or not. Where a complaint is not deemed to be vexatious, it will be returned to the appropriate point in the complaints handling process.

If a complaint is deemed to be vexatious, Zahir Nasser will respond directly to the complainant explaining why it is thought to be so and explain that the complaint will be closed with no further action. Zahir Nasser will also consider if the making of a vexatious complaint also requires the application of a restriction on communication following unreasonable behaviour.

The decision to declare a complaint as vexatious will be recorded in the complaints register for future reference. Any declaration that refers to the specific complaint being vexatious and any further complaints from the same individual will still be considered.

If any individual wishes to challenge a decision made in relation to this policy, and all attempts to resolve the complaint locally have been unsuccessful, details of the CCG's complaints team and Parliamentary and Health Service Ombudsman (PHSO) will be shared with the complainant.

The Complaints Log

A record will be held of all complaints raised and contain the following information:

- Each complaint received
- Subject matter and outcome
- Details of any reason for delay where investigations took longer than the agreed response period
- The date the report of outcome was sent to the complainant

Where complaints relate to a patient, a copy of the complaint will be held in their patient records so that the patient can reflect on the recommendations.

Where complaints are raised by telephone, the log will include the date and time of the call and this should be followed up with written confirmation of the areas discussed.

Where a complaint indicates the potential abuse of patients, safeguarding policies will be followed as per 's policy and procedure and necessary notifications made to the Care Quality Commission.

Where complaints are to be shared as part of learning, the complaint should be anonymised so that there is no identifiable patient information.

Investigations

All investigations will be managed by using the following approach:

- Investigating the fact
- Assessing evidence
- Reviewing records
- Interviewing those involved

Where necessary, advice and support will be sourced via senior managers within Grayshott Dental. The complaint should be investigated by a member of staff with the knowledge, experience and seniority to undertake the investigation robustly.

Confidentiality of information will be considered at all times and staff will adhere to the confidentiality policies and relevant codes of practice.

If an investigation of a complaint results in disciplinary action for staff within Grayshott Dental, the complaint will continue to its conclusion. The complainant will be informed that the investigation has led to a disciplinary process, but the details of the outcome or ongoing investigation should remain confidential.

Unresolved Complaints

There are many bodies that can support, or will need to be informed of, unresolved complaints: Care Quality Commission

Individuals can escalate their complaint to the Care Quality Commission via:

- Website www.cqc.org.uk (<http://www.cqc.org.uk>)
- Email enquiries@cqc.org.uk (<mailto:enquiries@cqc.org.uk>)

Parliamentary and Health Service Ombudsman (For Patients who are NHS funded)

General Dental Council

If a complaint involves the serious misconduct of a healthcare professional, their relevant professional body can be informed and this is determined on an individual case basis in discussion with the Registered Manager.

Dental Complaints Services

If the dental treatment was carried out privately, then the Dental Complaints Services are often able to settle dental complaints fairly and effectively.

Compliments

Receiving compliments is an opportunity to celebrate and recognise success. Grayshott Dental will ensure that:

- All compliments are shared with staff and displayed in public areas to highlight good practice
- Compliments are anonymised or permission is sought before displaying them
- Numbers of compliments received are logged as part of a quality assurance programme

Suggestions

Suggestions can be made verbally or in writing and generally are in response to seeking a means of changing practice for the better.

- Suggestions are not complaints, but in some circumstances, if they are not considered or actioned, they could lead to a complaint
- When suggestions are raised in meetings or as part of a conversation, these should be documented and then outcomes of such suggestions recorded to show that they have been considered
- Staff should be encouraged to share their suggestions with the manager
- Consideration should be given to implementing a suggestions system to encourage comments from patients, staff and visitors

Audit and Evaluation

Grayshott Dental will monitor, review and analyse all information received about the service as a means of continuously reviewing performance, quality and safety.

Grayshott Dental will also:

- Share themes and trends with staff
- Ensure that staff are trained to deal with complaints and understand the procedure for managing complaints

Anonymous Complaints

Anonymous complaints should be investigated in the same way as named complaints. They should be logged and any corrective action necessary should be taken and also logged.

All efforts will be made by Zahir Nasser to resolve all complaints within Grayshott Dental. If a Patient does not wish to raise a complaint directly with the management within Grayshott Dental, in the first instance, staff should try and sensitively establish the reasons why and aim to resolve and address any concerns that present.

Decisions to raise complaints outside of Grayshott Dental will be fully respected and the Patient should be supported to raise their complaint to the commissioner of the service or to seek the support of an independent advocate or representative. Staff should also refer to section 5.6 for a further list of organisations that can be accessed. Patients can also be signposted to the Citizens Advice service.

Related Documents required to complete

- Complaints Flowchart
- Practice leaflet with complaints procedure
- Complaints Log

Related CQC Key Line of Enquiry

This policy reflects following key lines of enquiry:
Caring, Responsive, Safe, Well-Led

Our Practice Protocol

- All complaints are logged, investigated and the outcomes are fed back to the complainant within the agreed timescales
- Complaints are logged and filed
- Complaints are dealt by: Tasmin Bradley
- The practice leaflet has details of how to report a complaint
- Trends in complaints are identified and tracked to improve service delivery
- A clear ethos of honesty and support is embedded throughout all policy and procedures
- Staff have a thorough understanding of complaint and concerns policies and feel confident to support Patients and act on behalf of the workplace in a professional and non-discriminatory manner at all times
- There is evidence of annual reporting as a means of commitment to transparency and quality. An annual report detailing numbers of complaints, compliments and suggestions and actions taken as a result is prepared and published
- Patients are involved in the complaints handling process and future design of procedures. Their views influence future management decisions