



University College
of Osteopathy

Patient Complaints Procedure Associate Clinic

Core Documentation Cover Page
Patient Complaints Procedure (Associate Clinic)

Version number	Dates produced and approved (include committee)	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
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V2.0	Dec 2014 PRAG Chair	Administrative Amendment to reflect current staff role titles.	Head of Clinic	All master versions will be held in: J:\0 Quality Team - Core Documentation Intranet	Dec 2016
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Equality Impact

Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)

Neutral equality impact (i.e. no significant effect)

X

Negative equality impact (i.e. increasing inequalities)

If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk

Patient Complaints Procedure (Associates)

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1. SCOPE

- 1.1 The aim of the Patient Complaints Procedure (Associate Clinic) is to listen to and discuss patients' concerns and to take action as appropriate.

2. INTRODUCTION

- 2.1 The University College of Osteopathy (UCO) always endeavours to make sure that you receive the highest standard of care during your time as a patient. We welcome comments about the services we offer and regret any patient having cause to make a complaint. We accept and are sorry that on occasion the service we give may not be to an individual's satisfaction. Consequently, if you are unhappy with the standard of care you have received or with the way we have organised your care, we would like to hear about it and recognise that it may be important for you to make a complaint. The UCO clinical centre takes all comments, suggestions and complaints seriously; listening to what you have to say can help us improve the quality of what we do to better meet your needs and the needs of the community.
- 2.2 If you are unhappy about any aspect of your care, please speak to your osteopath or the clinic receptionist in the first instance. They are there to help you and will try to resolve the matter in an efficient and satisfactory way. We hope that the majority of informal complaints can be dealt with in this way.
- 2.3 If you do not wish to complain but would like to make a comment or suggestion for improvement of our services, please complete a patient feedback form which you will find located on the information leaflet rack in the UCO clinical centre's reception area, or on request from the clinic receptionists. These can then be left in the comments box in the reception area, either anonymously or with your contact details if you require a response. However, if you feel that you wish to make a complaint this policy is written to explain precisely how to go about this, how the process works and what to do if you are not satisfied with the outcome of your complaint.
- 2.4 The UCO Patient Complaints Procedure (Associates) has been developed with best practice in mind. To that end it is informed by current NHS guidelines regarding handling patient complaints. Consultation has also taken place with the General Osteopathic Council who regulate the practice of osteopathy in the United Kingdom.

3. AIMS

- 3.1 The aim of the Patient Complaints Procedure is to listen to and discuss your concerns and to take action as appropriate.
- 3.2 The principles upon which this complaints procedure is based are:
 - a) That complaints from patients will be dealt with seriously and fairly.
 - b) That complaints will be investigated promptly.
 - c) That all complaints will be considered on their individual merits, but in accordance with the UCO's equal opportunities policy, all complainants will be treated equally; there will be no victimisation of a complainant. Any ongoing care or provision of service will be unaffected by the instigation of a complaint.
- 3.3 The process will be fair to you and to our staff and students.
- 3.4 That all complaints will be dealt with in confidence unless the complainant has indicated otherwise, although as a matter of good practice, the Head of Clinical Practice will be notified of all formal and informal complaints.
- 3.5 Strict confidentiality will be observed with information only being shared with staff and students who need to know.

- 3.6 That the UCO's Quality Assurance Committee will review a summary of all complaints annually and will reflect on all comments and complaints made and where appropriate identify how to improve current practice for the benefit of osteopaths, staff and patients in the future
- 3.7 That the principles of natural justice are followed in a manner which is appropriate to the individual circumstances of the complaint. Those who investigate or adjudicate on a complaint will do so impartially and fairly and will not act in relation to any matter in which they have, or may have, a material interest, or an actual or potential conflict of interest.
- 3.8 The UCO also has a Public Interest Disclosure (Whistleblowing) Policy that can be found here: <https://www.uco.ac.uk/about-uco/who-we-are/policies-procedures-and-privacy>

4. DEFINITION OF A COMPLAINT

- 4.1 For the purposes of this policy a complaint is defined as "an expression of dissatisfaction received from a patient, carer or service user about any aspect of the UCO's services which require a response, whether it be verbally or in writing."
- 4.2 Such expressions of dissatisfaction may be made in a variety of ways; verbally, in person or by telephone, email or in writing.
- 4.3 This wide definition is designed to empower as many members of staff to resolve minor comments, concerns and problems immediately and informally.
- 4.4 The decision as to whether a matter is dealt with informally as a concern or as a formal complaint should rest with you, the patient/relative/carer. The decision should be based on information about options available to you provided by our staff.
- 4.5 Complaints should normally be made within six months of the event or six months of the date of discovering the problem, provided that it is within 12 months of the initial event. The UCO has the discretion to extend this time limit where it would be unreasonable in the circumstances of a particular case for the complainant to have made their complaint earlier. Such decisions will be made by the Head of Clinical Practice in consultation with senior colleagues when necessary. All complaints received will be heard appropriately, but it should be recognised that if a complaint is received about an event that took place outside of the timeframes above, it may be difficult to do anything about the incident.

5. WHO CAN COMPLAIN?

- 5.1 Anyone who is receiving or has received treatment or services from the UCO clinic can complain. If a patient is unable to complain themselves, then a relative, carer or friend can complain on their behalf.
- 5.2 If a complaint is raised on behalf of a relative or friend, the patient must provide written consent, unless the complainant is the parent or guardian of a child aged 16 or under
- 5.3 If a complaint is raised concerning a deceased patient, then this must be made by a suitable representative, preferably a close family member.

A) EXCEPTIONS

- 5.4 There are exceptions as to who can make a complaint, whether formal or informal. For example:
 - a) Individuals making complaints on behalf of someone else who are unable to provide written consent from the complainant.
 - b) Individuals who are pursuing legal action against the UCO in relation to this complaint. In such a case any complaints in process will be suspended pending the completion of any legal process.

- c) If the complaint is registered outside the recognised time frame detailed above without any mitigating circumstances.

6. HOW TO COMPLAIN: A THREE STAGE PROCESS

A) STAGE ONE – INFORMAL COMPLAINT STAGE

- 6.1 If you have a complaint, you are encouraged to speak with your osteopath or the UCO's clinic reception team about the matter to try and resolve it informally. If you would rather speak with a senior member of the clinic management about any matter then this can be arranged. Please ask any member of the care team to organise this.
- 6.2 It is expected that many complaints will be resolved amicably and quickly in this informal way. Normally, informal complaints of this sort should be acknowledged and responded to immediately if received face-to-face, or via the telephone, and between three to five working days if received via email or letter.
- 6.3 If an informal complaint requires the UCO to look into the matter further (i.e. it cannot be resolved immediately) then a response will be given to the complainant within two to four weeks. Typically, responses in such circumstances will be responded to via letter or email.
- 6.4 It is anticipated that this informal procedure will enable many complaints to be resolved to the satisfaction of the complainant.
- 6.5 If the complaint cannot be satisfactorily resolved in this informal manner, or you feel that you would like to complain formally, you may make use of the next stage of the procedure.
- 6.6 Typically, all informal complaints will be logged on the Informal Complaint Form (Appendix 1), so that they can be audited and reviewed. This allows the clinic to act on particular issues and identify any themes or trends that require further evaluation. Such complaint forms will be completed by the individual receiving the complaint whenever possible.
- 6.7 Informal complaint forms can be obtained in the following ways:
- From the UCO's clinic reception team. Please either ask in person or call 020 7089 5360 or email clinicappointments@uco.ac.uk.
 - They can also be downloaded from the UCO's clinic website here: <https://www.clinic.uco.ac.uk/about-osteopathy/regulations>

B) STAGE TWO – FORMAL COMPLAINT STAGE

- 6.8 A complaint that cannot be satisfactorily resolved informally may be submitted formally. This means that the details of the complaint are recorded on a formal complaints form. All formal complaints require a full complaint report to be written on a Formal Complaint Form (Appendix 2).
- 6.9 You can obtain a formal patient complaint form in the following ways:
- From the UCO's clinic reception team. Please either ask in person, or call 020 7089 5360 or email clinicappointments@uco.ac.uk
 - Download from the UCO's clinic website here: <https://www.clinic.uco.ac.uk/about-osteopathy/regulations>
 - By writing directly to:
The Patient Complaints Officer
The University College of Osteopathy
275 Borough High Street
London, SE1 1JE
Email: complaints@uco.ac.uk | Tel: 020 7089 5353

- 6.10 On the receipt of a formal complaint, the Patient Complaints Officer will:
- Provide a verbal or written acknowledgement of your concerns within two working days and will keep the patient up to date with any progress or developments as appropriate;
 - Inform any member(s) of staff and/or students concerned that a formal complaint has been received;
 - Appoint an appropriate Investigating Officer to investigate the formal complaint; they will seek relevant documentation or statements from any member(s) of staff or student(s).
- 6.11 The Complaints Committee will be made up of three members, at least one of which should be a lay member, and will typically be chaired by either, the Deputy Vice-Chancellor (Research), the Deputy Vice-Chancellor (Education) or the Dean of Academic Development. The Chair of the Complaints Committee shall then convene a Complaints Committee hearing.
- 6.12 The Complaints Committee will consider the evidence, and will be able to make one of the following recommendations:
- That the complaint is not upheld, and that no further action should be taken.
 - That the complaint is upheld and that appropriate action is necessary.
- 6.13 In situations where the complaint relates to staff behaviour, complaints will be referred to human resources for further action under the staff disciplinary policy.
- 6.14 Patients are entitled to be accompanied by a friend or representative at any hearing where their complaint is to be discussed. This could be a family member or personal friend. Legal representation is not considered appropriate under such circumstances.
- 6.15 A friend or representative may speak on behalf of the patient provided clear consent has been given by the patient at the hearing.
- 6.16 Normally the Complaints Committee will provide a written decision to the complainant within twenty five working days of receiving the complaint. The reasons for the decision will normally be given. However, if your complaint is complex or raises a number of serious issues, it may take longer to investigate. You should be kept informed of the progress being made and of the reasons for any delays.
- 6.17 The outcome of the Complaints Committee will be reported to the complainant on completion of the appropriate process.
- 6.18 It is important to note that all registered osteopaths, are bound by the standards published from time to time by the General Osteopathic Council (GOsC). The UCO has a responsibility to inform the GOsC if any of its clinical staff fail to adhere to the code of practice. The UCO has a duty to inform the GOsC of any serious breach of these standards. Therefore it may be appropriate for the Committee to refer the complaint to the GOsC if they feel that the evidence indicates that the code has been breached.

C) STAGE THREE – APPEAL

- 6.19 If you are not, for any reason, satisfied with the outcome of Stage Two of the procedure, you have the right to appeal. In this instance you may take your complaint further by referring it in writing to the Vice-Chancellor of the UCO:
- The Vice-Chancellor
University College of Osteopathy
275 Borough High Street
London
SE1 1JE
- 6.20 The complainant should submit a statement in writing to the Vice-Chancellor, stating clearly the reason(s) why s/he is not satisfied with the outcome of the Stage Two procedure. The

Vice-Chancellor shall be provided with the details of the case and all relevant documentation by the Patient Complaints Officer and will review the case and may, if necessary, take further advice. It may be possible for the complaint to be resolved using the documentation already collected, however the Vice-Chancellor may investigate further by calling for more evidence relevant to the case. A hearing may be called at which both the complainant and any other persons involved may put their views forward.

- 6.21 Following this, a decision will normally be communicated to the complainant in writing within twenty working days of the submission to the Vice-Chancellor. Throughout this process you shall be kept informed of the progress being made and the reasons for any delays.
- 6.22 The Vice-Chancellor's decision regarding the outcome of the complaint will be final.
- 6.23 The Vice-Chancellor may propose that a complaint which has reached Stage Three of the process and is proving difficult to resolve be referred to a mediation procedure. Such a procedure would normally involve a mediator, in order to assist the UCO and the complainant to resolve the matter. Any mediator should not be a member of staff or a student of the UCO. The mediation procedures to be adopted would be agreed between the complainant and the Patient Complaints Officer dealing with the matter.
- 6.24 Further to the processes outlined above, the General Osteopathic Council (GOsC), the regulator of the osteopathic profession, may be contacted. Here you should direct your concerns to the Fitness to Practise department where they will be able to advise you on an appropriate course of action. The GOsC contact details are:

General Osteopathic Council
176 Tower Bridge Road
London SE1 3LU
www.osteopathy.org.uk/

Tel: +44 (0) 20 7357 6655
Fax: +44 (0) 20 7357 0011

The GOsC's complaints procedure can be found at:
<http://www.osteopathy.org.uk/information/complaints/making-a-complaint/>

7. OTHER USEFUL RESOURCES

A) THE CARE QUALITY COMMISSION

The Care Quality Commission (CQC) (formerly the Healthcare Commission) is the independent regulator of health and social care in England. Their aim is to make sure better care is provided for everyone, whether that's in hospital, in care homes, at GP's, dentists or elsewhere.

They do this by inspecting services and publishing their findings. They can be contacted at:

CQC National Customer Service Centre
Citygate
Gallowgate
Newcastle upon Tyne
NE1 4PA

Telephone: 03000 616161
Fax: 03000 616171

There is also an online contact form available at:
<http://www.cqc.org.uk/content/contact-us-using-our-online-form>
The CQC's website can be found at: <http://www.cqc.org.uk/>

B) THE PATIENTS ASSOCIATION

The Patients Association was set up in 1963 to promote the voice of patients in healthcare. They are a registered charity committed to making a difference to the 'patient journey'.

The Patients Association

PO Box 935

Harrow

Middlesex HA1 3YJ

Telephone: 020 8423 9111

Fax: 020 8423 9119

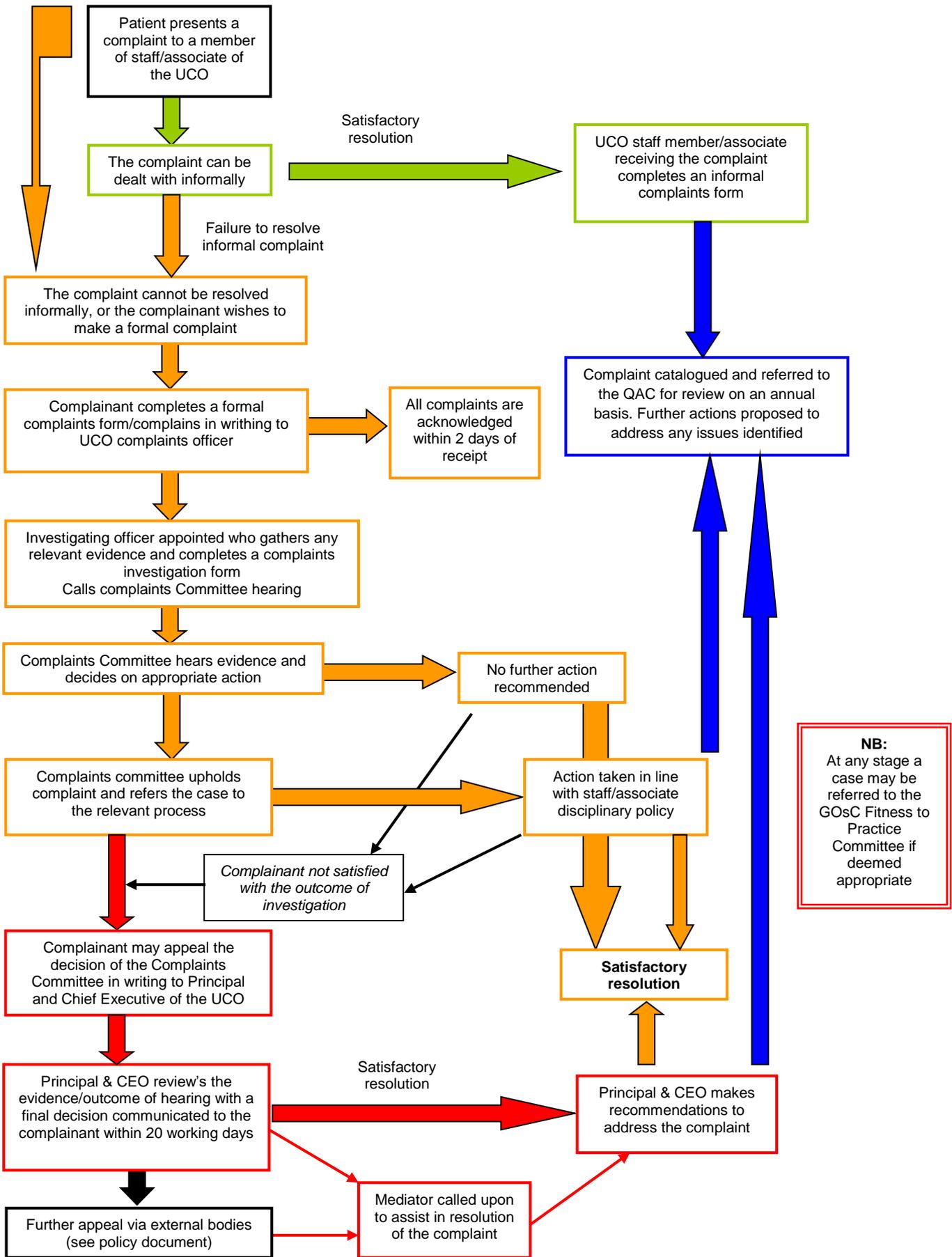
Website: <https://www.patients-association.org.uk/>

The Patients Association Helpline offers you independent information and advice on a range of healthcare issues.

Telephone: 020 8423 8999

Email: There is also an online contact form available at:

<https://www.patients-association.org.uk/contact>



APPENDIX 1: INFORMAL PATIENT COMPLAINT FORM

Patient Complaints Procedure: Informal Complaint Form

This form is designed to be completed when an individual makes an informal complaint or has a concern with regards to any aspect of the UCO, services or facilities.

Although a complaint may be dealt with effectively at the time it is very helpful for us to identify what problems arise so that we are able to act to alter our policies and processes to address them in the future.

The UCO staff member/associate who dealt with the complaint is responsible for completing the form, in conjunction with the patient and any other relevant parties (such as students, other staff members).

To help us understand the complaint and deal with it efficiently please give as much detail as you can.

Please complete this either in blue or black ink, or electronically so that the information is as clear as possible.

UCO Staff member to complete in conjunction with the patient as appropriate:

Complaint received by (UCO staff/associate)	
Name of member of staff/associate:	
Role at UCO:	
Complainant's details	
Name:	
Address:	
Telephone:	
Email:	
Patient's name and address, if different	
Name:	
Address:	
Telephone:	
Email:	

Brief details of complaint/incident (including date, time, place and names of people or staff involved and any relevant background information):

Is any on the spot action possible which would/was able to resolve the matter to the satisfaction of the complainant? If so, give details.

Ascertain whether the complainant would be/was satisfied with the action proposed.

Action taken following discussion:

If the matter cannot be resolved to the satisfaction of the complainant at the time, is judged to be more serious or requires further investigation, inform the complainant of action to be taken e.g. referral to the appropriate line manager. The complainant will receive a letter of confirmation that the complaint is being investigated further.

Has the complaint been resolved? (Please delete as appropriate):	Yes	
	No	If no, please refer to the appropriate line manager.
Has the complaint been referred to the appropriate line manager? (Please delete as appropriate):	Yes	If yes, please specify the name of the referee below.
		Name: <input type="text"/>
	No	
Completed by / Designation:	<input type="text"/>	
Date:	<input type="text"/>	
Does the patient require written confirmation of the informal complaint and the actions taken? (Please Tick):	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>
Patient Informed of Outcome by: (Please Tick):	Letter	<input type="checkbox"/>
	Telephone	<input type="checkbox"/>
	Email	<input type="checkbox"/>
	Date:	DD/MM/YYYY

Please forward this Informal Complaint Form to the Head of Clinical Practice so that the issues raised can be logged, which forms part of the quality assurance processes of the UCO.

Referral Form (to be completed by appropriate line manager):

Further investigation / Action record:	
Signed:	
Date:	

APPENDIX 2: FORMAL PATIENT COMPLAINT FORM

Patient Complaints Procedure: Formal Complaints Form

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

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

To help us understand your complaint and deal with it efficiently please give as much detail as you can. Please complete this either in blue or black ink, or electronically so that the information is as clearly as possible. If you are unsure about anything and would like to speak with someone about completing this form then please call the UCO's Patient Complaints Officer (020 7407 5353).

To be completed by the complainant or their representative:

COMPLAINANT'S DETAILS:		
TITLE:	e.g. Mr, Mrs, Miss, Dr etc	male / female (please circle)
FULL NAME:		
CONTACT ADDRESS:		
CONTACT PHONE: HOME		
CONTACT PHONE: MOBILE		
CONTACT E-MAIL (if you have one):		
If you are complaining on behalf of a patient then please state your relationship to them:	e.g. relative, carer, next of kin, solicitor	

To be completed by the complainant or their representative

Details of the patient (if different from above)		
PATIENT'S DETAILS:		
THE PATIENT'S TITLE:	e.g. Mr, Mrs, Miss, Dr etc	male / female (please circle)
THE PATIENT'S NAME:		
THE PATIENT'S CONTACT ADDRESS:		
THE PATIENT'S DATE OF BIRTH:		

Patient Consent: to be completed by the patient

Please note, if the patient is 16 years of age or younger, then this section does not need to be completed by the patient.

If you are complaining on behalf of a patient then you will need to get them to declare that they consent to this and they will need to sign 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 and osteopathic records.

Signed (by the Patient):	
Date:	

To ensure that you are able to make a fully informed complaint it is recommended that you read the full UCO Patient Complaints Procedure.

I hereby declare that I have read a copy of the full University College of Osteopathy Patient Complaints Procedure.

Signed (by the patient):	
Date:	

To be completed by the complainant or their representative:

DETAILS OF THE COMPLAINT:

Please describe the nature of your complaint as fully as possible, including details such as when and where and who was involved.

If needed, please use separate sheets and attach these securely to this form.

Please state here how many additional sheets you have attached:

Did you speak to anyone informally at the time to help you with these concerns?

Yes / No (Please circle)

If yes, please complete the following

Include the staff or associates name, post, and whether this was in the general clinic or a specialist clinic if possible:

Please describe any action that was taken at the time to resolve your complaint:

If you have any relevant documents such as letters or medical records that may support your complaint, then please list them here and enclose copies of them when you return your form:

How do you propose the complaint could be resolved to your satisfaction?

Consent and Declaration:

For the UCO to deal appropriately with your complaint, we will need to disclose the details of it to the staff and students involved and their line managers. We are unlikely to be able to proceed any further with your complaint unless you sign and date this section.

I agree that the UCO can disclose my complaint and any information that I have given, to the staff and students involved. I also agree that the staff and students can disclose any relevant information regarding my case so that my complaint may be fully investigated.

Signature of complainant or patient (as authorised on Page Three of this form):

Signed:	
Date:	

Checklist – Have you:

Given clear details of how to contact you (or the complainant if different to the patient)?	<input type="checkbox"/>
Had the patient sign the declaration statement if you are complaining on their behalf?	<input type="checkbox"/>
Described the complaint as fully as possible?	<input type="checkbox"/>
Attached additional sheets if used?	<input type="checkbox"/>
Enclosed any relevant documents such as letters or medical records?	<input type="checkbox"/>
Checked that the consent and declaration section has been signed?	<input type="checkbox"/>

Where to return this form to:	What happens next:
<p>The Patient Complaints Officer The University College of Osteopathy 275 Borough High Street London SE1 1JE Email: complaints@uco.ac.uk Tel: 020 7089 5353</p>	<p>You should receive a verbal or written acknowledgement of your concerns within two working days of a complaint being received.</p> <p>You would normally receive a written decision to your complaint within twenty five working days of the UCO receiving the complaint.</p>

FOR OFFICE USE ONLY (PATIENT COMPLAINTS OFFICER):

DATE RECEIVED:		ACKNOWLEDGEMENT SENT:	
Action Notes:		Action Notes:	