Harrow Health CIC Complaints Policy

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1. Introduction

Harrow Health CIC is committed to delivering safe, effective, high-quality, and patient-centred healthcare services. We recognise that complaints, concerns, compliments, and feedback provide valuable opportunities to improve the services we provide.
This policy outlines the arrangements for receiving, investigating, responding to, and learning from complaints and concerns in accordance with NHS and Care Quality Commission (CQC) requirements.

Harrow Health CIC aims to:

Ensure complaints and concerns are handled fairly, openly, and promptly
Support patients and service users to raise complaints or concerns without fear
Learn from complaints and concerns to improve services
Promote openness, transparency, and accountability
Meet statutory and regulatory obligations

2. Legal and Regulatory Framework

This policy is based upon:

- Local Authority Social Services and National Health Service Complaints Regulations 2009
- Health and Social Care Act 2008
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014
- CQC Regulation 16: Receiving and Acting on Complaints
- NHS Constitution for England
- Parliamentary and Health Service Ombudsman (PHSO) Complaint Standards
- UK GDPR and Data Protection Act 2018
- Duty of Candour Regulations

3. Scope

This policy applies to all Harrow Health CIC employees, contractors, agency staff, volunteers, NHS patients, and relevant stakeholders including family members, advocates, commissioners, external health professionals, and regulatory bodies.
This policy covers complaints and concerns relating to:

- Clinical treatment or care
- Delays in treatment or access
- Communication issues
- Administrative processes
- Staff conduct or attitude
- Confidentiality concerns
- Safety concerns
- Equality and accessibility issues

4. Definitions

Complaint
An expression of dissatisfaction requiring a formal response and investigation.
Concern
An expression of worry, query, or dissatisfaction that can usually be resolved quickly and informally without requiring a formal complaint investigation.
Harrow Health CIC aims to resolve concerns promptly at the earliest opportunity wherever possible.
Compliment
Positive feedback regarding staff, services, or patient experience.
Complainant
A person making a complaint or raising a concern on behalf of themselves or another individual.

5. Principles of Complaint Handling

Harrow Health CIC will ensure that:

- Complaints and concerns are easy to raise
- Complainants are treated respectfully and fairly
- People are not discriminated against for making complaints or raising concerns
- Complaints and concerns are handled confidentially
- Investigations are objective and proportionate
- Lessons learned improve patient care and services
- Responses are timely, clear, and empathetic

6. Roles and Responsibilities

Board of Directors
Responsible for Oversight of complaint governance, reviewing themes and learning, Ensuring regulatory compliance

Governance Team – Head of Corporate and Business Support Services
Responsible for Managing complaints and concerns processes, coordinating investigations, Monitoring timescales, Reporting themes and trends, ensuring learning actions are implemented

Managers
Responsible for Supporting investigations, ensuring staff cooperation, Implementing improvement actions

All Staff
Responsible for Listening respectfully to complaints and concerns, Escalating complaints and concerns appropriately, cooperating fully with investigations, Learning from complaint outcomes

7. Equality, Diversity and Accessibility

Harrow Health CIC is committed to ensuring the complaints process is accessible to all individuals. Support may include:

- **Translation and interpretation services**
- **Accessible formats**
- **Easy Read documents**
- **Advocacy support**
- **Assistance completing complaint forms**

Reasonable adjustments will be made where required.

8. How to Make a Complaint or Raise a Concern

The most efficient way to raise complaints and concerns is via our e form available on our website. Contact Us | Harrow Health Right To Choose

This can also be raised:

In writing;

By email: Harhl.feedback@nhs.net

Verbally or by telephone: 0208 866 4100 Option 3

Through an advocate or representative

Support and Advocacy

Independent advocacy services are available to assist complainants, including POhWER and Voice Ability. Advocacy - Someone to speak up for you (advocate) - Social care and support guide – NHS

Contact social care services at your local council and ask about advocacy services. Find your local social care services.

POhWER is a charity that helps people to be involved in decisions being made about their care. Call POhWER's support centre on 0300 456 2370 for advice.

The Advocacy People gives advocacy support. Call 0330 440 9000 for advice or text PEOPLE to 80800 and someone will get back to you.

Voice Ability gives advocacy support. Call their helpline on 0300 303 1660 for advice or use Voice Ability's online referral form.

Contact your local Age UK to see if they have advocates in your area. Visit Age UK online or call 0800 055 6112.Reasonable adjustments such as language interpretation, British Sign Language, and accessible formats are provided on request.

9. Confidentiality and Consent

Complaint and concern information will be handled confidentially and stored securely in accordance with:

- UK GDPR
- Data Protection Act 2018
- NHS Records Management Code of Practice

Where complaints or concerns are raised on behalf of another person, appropriate consent may be required before confidential information can be disclosed.

10. Time Limits

Complaints should normally be made within 12 months of the incident, or within 12 months of becoming aware of the matter.

Late complaints may still be considered where there is good reason and a fair investigation remains possible.

11. Complaints and Concerns Procedure

Stage 1 – Receipt and Acknowledgement

All complaints and concerns will:

- Be logged securely where appropriate
- Be risk assessed
- Receive acknowledgement within 3 working days

The Patient Services team will aim to contact you where possible to

- Clarify the issues raised
- Agree desired outcomes
- Explain the investigation process where required
- Confirm likely response timescales

Concerns Resolution

Where appropriate, concerns may be resolved informally without progressing to a formal complaint investigation.
Harrow Health CIC aims to resolve concerns within 30 working days.
Where a concern cannot be resolved informally, or where the individual remains dissatisfied, the matter may be escalated to the formal complaints process.

Stage 2 – Investigation

Investigations will be proportionate and objective, include review of records where necessary, involve relevant staff and managers identifying learning opportunities and service improvements.
Where complaints raise serious concerns, the matter may also trigger Incident investigation, Safeguarding procedures, Duty of Candour requirement, Risk management escalation.

Stage 3 – Response

The final response will include:

- Summary of the complaint, Findings from the investigation, Apology where appropriate, Actions taken or planned, Learning identified, Information regarding escalation rights

Responses will be:

- Clear and easy to understand, Respectful and empathetic, Provided within agreed timescales

12. Response Timescales

Activity	Standard
Complaint or concern acknowledgement	Within 3 working days
Concern resolution	Within 30 working days
Complaint response	As agreed, up to 90 working days
Overdue complaints	Subject to escalation reporting and governance review

Harrow Health aims to investigate and respond to complaints as promptly as possible. We will liaise with the operational team at the earliest point possible to ensure any gaps identified in your care are mitigated where possible.

Depending on the complexity of the complaint, responses may take between 30 and 90 working days.

Where complaints are particularly complex, involve multiple agencies, require detailed clinical review, or involve external investigations, complainants will:

- Be informed of any delays
- Receive regular progress updates
- Be advised of revised response timescales where necessary

Complaints exceeding agreed response timescales will be escalated through governance reporting processes for oversight, monitoring, and assurance.

Where Harrow Health CIC is unable to provide a response within the agreed timescale, the complainant will receive a holding letter providing a revised response timescale. Holding letters will be issued in a timely manner to ensure complainants are kept informed throughout the complaints process.

13. Complaints Excluded from this Procedure

The following are generally excluded:

- Employment grievances
- Disciplinary matters
- Freedom of Information requests
- Subject Access Requests
- Legal claims or litigation
- Complaints previously investigated under NHS regulations

14. Escalation

If a complainant remains dissatisfied after local resolution, they may contact:
Parliamentary and Health Service Ombudsman (PHSO)
Website:www.ombudsman.org.uk
Telephone:0345 015 4033
The Ombudsman provides independent review of unresolved NHS complaints.

15. Duty of Candour

Where complaints identify patient safety incidents causing harm, Harrow Health CIC will comply with statutory Duty of Candour requirements.
This includes:

- Openness and transparency
- Timely apology
- Clear explanation
- Ongoing communication with patients and families

16. Learning from Complaints and Concerns
Complaints and concerns are important sources of learning and quality improvement. Harrow Health CIC will:

- Analyse themes and trends
- Identify recurring issues
- Share learning across teams
- Monitor actions and improvements
- Use complaints and concerns to support service development.

Learning may be discussed through:

- Governance meetings
- Clinical meetings
- Quality improvement programmes
- Staff supervision and training

17. Record Keeping
Complaint and concern records will include complaint or concern details, Investigation notes, correspondence, outcomes and actions. Records will be retained securely in accordance with NHS records management requirements.

18. Monitoring and Governance
The organisation will monitor the number and type of complaints and concerns, response times, themes and trends, outcomes and actions, patient satisfaction and learning implementation.

Complaints reporting may be reviewed through board meetings, governance committees, quality and safety meetings.

19. Staff Training
Relevant staff will receive training appropriate to their role, including:

- Complaint handling
- Communication skills
- Duty of Candour
- Equality and diversity
- Investigation skills
- Conflict resolution

20. Related Policies
Patient Safety Incident Reporting Policy, Duty of Candour Policy, Safeguarding Policy, Equality and Diversity Policy, Data Protection Policy, Whistleblowing Policy, Risk Management Policy.

Appendix 1 – Complaint Process Flowchart