



HETTON DENTAL PRACTICE

COMPLAINTS HANDLING POLICY

We are committed to providing high quality care for all and will ensure that our patients and their representatives can seek advice, provide feedback or make a complaint about any aspect of our service. This policy describes how we receive, manage, respond to and learn from complaints made about our service. All members of the team are expected to understand and follow this policy when dealing with a patient complaint.

The key aspects of this policy are that:

- Our patients know how to complain and are confident that we will take their complaint seriously
- We will investigate all complaints and will keep the patient informed of the findings of our investigation
- We will learn from any complaints, concerns and feedback that we receive and use these lessons to improve our service.

INFORMATION FOR PATIENTS

We believe that if a patient wishes to make a complaint or register a concern about any aspect of our service, they should find it easy to do so. Our code of practice for handling complaints, encourages patients to let us know when our service has not met their expectations and explains how we will investigate their complaint and keep them informed.

Copies of our code are on display in reception and are published on our website.

OUR APPROACH TO COMPLAINTS

A complaint can be made by a patient of the practice or a person acting on their behalf if the patient is a child, has physical or mental incapacity, has consented to the person acting on their behalf, or has delegated authority to act on their behalf. A complaint can also be made by an individual who is, or is likely to be, affected by our actions, inactions, decisions or omissions.

A complaint provides us with the opportunity to identify where our practice systems have failed and what we can do to improve our service. In dealing with a complaint, we will

- Be open and transparent to ensure that all those involved understand the process and what to expect
- Acknowledge a complaint promptly
- Undertake evidence-based investigations
- Provide sympathetic responses within appropriate timeframes
- Identify the causes of complaints and act to prevent recurrence
- Learn lessons and implement change
- If the individual is a patient of the practice, ensure that their ongoing care is not adversely affected by the complaint.

PRACTICE COMPLAINTS PROCESS

Handling a complaint efficiently and sympathetically from the outset may encourage early resolution and avoid the need for a formal complaint process, involving investigation and formal reports. which is stressful and time-consuming for all concerned.

When making a complaint, an individual usually wants an apology and to know what happened and why, what will be done to put it right, what action will be taken immediately and to prevent the cause for complaint happening again.

RECEIVING COMPLAINTS

All members of the team must be able to receive a complaint or feedback (verbal or written) and deal with it appropriately. You should bear in mind, that the individual making the complaint may not refer to their concern as a complaint.

The practice Complaints Manager, Victoria Gamon, is responsible for dealing with all complaints received by the practice, unless immediate resolution is possible.

The responsible person in charge of overseeing our complaints procedure and implementing changes where necessary is Victoria Gamon.

Verbal complaints: Listen to what the individual is saying and be polite and considerate; avoid justifying the action that led to the complaint or being dismissive of the individual's concerns. Where possible and, depending on the nature of the complaint, you should aim to resolve the matter as soon as it is received, making a note of the complaint and how you resolved it and pass the information to the Complaints Manager, Victoria Gamon.

If you are unable to resolve the complaint immediately, you should encourage the individual to speak with the Complaints Manager. If the Complaints Manager is not available, you should take brief details of the complaint and arrange a convenient time for the Complaints Manager to contact the individual. Your notes should be passed to the Complaints Manager and a copy given to the patient, together with a copy of the code of practice for handling patient complaints.

If the complaint requires an urgent response and the Complaints Manager is not available, you should pass the complaint to John Gamon.

Written complaints: If you receive a written complaint (by letter or email.), you should pass it immediately to the Complaints Manager.

ACKNOWLEDGEMENT

The Complaints Manager will acknowledge the complaint in writing within three working days and enclose a copy of our code of practice for handling complaints. If a delay in acknowledging the complaint is anticipated, the reason for the delay will be explained to the individual.

The acknowledgement will include

- Confirmation that the matter will be investigated and that the individual will receive a report of the findings
- An offer to meet with the individual to discuss the complaint and gather information
- A description of how the complaint will be handled and who will be involved
- Anticipated timescales for the investigation and preparation of the report
- How the individual would like to be kept informed of progress
- Local organisations that can provide help.

The individual will be informed that they can obtain advice and information from the Independent Complaints Advocacy Team at the local ICB at <https://northeastnorthcumbria.nhs.uk/>

INVESTIGATION

The purpose of the investigation is to

- Understand what the complaint is about
- Establish what the individual would consider to be a satisfactory resolution
- Seek the views of other team members and seek suggestions on how to resolve the matter
- Identify other useful sources of information – for example, published research, suppliers

We aim for the investigation to be completed and for the individual to receive the report within 10 working days. Where we anticipate a delay, we will explain this to the individual and provide an update on progress at least every 10 working days.

RESPONSE

Before providing a written response, we will invite the individual to a meeting to discuss the findings of our investigation.

Our written response to the individual will

- Address all the issues raised and demonstrate that each has been fully and fairly investigated
- Include an apology where something has gone wrong
- Explain our conclusions and any action that we have taken as a result or explain why no further action is needed
- Include details of how to contact the NHS Ombudsman or the Dental Complaints Service if the individual remains dissatisfied

RECORDS

The Complaints Manager keeps full records of all complaints, investigations and responses. These records are kept securely and not with the individual's clinical records (if they are a patient of the practice). These records include:

- The date a complaint was received, by who and how (verbally or in writing)
- Details of the complaint and the results of the investigation
- Copies of any communications and records of telephone conversations and meetings
- The outcome of the complaint and any action that we took as a result
- Correspondence between the patient and the practice.

COMPLAINTS INVOLVING THE REGISTERED MANAGER OR PRACTICE MANAGER

Where a complaint is made about the Registered Manager, Practice Manager, or another member of the senior management team responsible for handling complaints, the practice will ensure the complaint is managed impartially and without conflict of interest.

In such circumstances:

- The complaint will be escalated to an alternative senior person within the organisation (e.g. Associate Dental Surgeon not involved in the issue).

- Where no appropriate internal person is available, the complaint may be referred to an external adviser or relevant governing body for independent review.
- The complainant will be informed of who will be handling their complaint and provided with clear contact details.
- All complaints will continue to be handled in line with the practice complaints procedure, ensuring fairness, transparency, and timely response.

If the complainant remains dissatisfied, they will be advised of their right to escalate the complaint to the appropriate external body (e.g. NHS complaints body, Dental Complaints Service for private care, or relevant regulator).

INDEPENDENT OVERSIGHT ARRANGEMENTS

Where internal separation of roles is not possible, the practice will obtain independent input through one or more of the following:

- A suitably qualified independent external dental clinician (e.g. GDP, specialist, or professional colleague not involved in the patient's care) – Clare Hindmarch, Associate Dental Surgeon
- The practice's indemnity provider, for advice on complaint handling, risk management, and response content
- A legal or professional adviser where appropriate

The practice acknowledges that indemnity providers support risk management but do not replace the need for independent clinical oversight. Therefore, clinical input may be sought in addition to indemnity advice where the complaint relates to treatment or clinical decision-making.

GOVERNANCE AND QUALITY ASSURANCE FRAMEWORK

To ensure appropriate oversight, the practice maintains a governance structure proportionate to its size, including:

- Independent clinical review for complaints involving clinical care where required
- A second-opinion process for complex or high-risk cases
- A central complaints log, including investigation outcomes and learning
- Trend analysis and periodic review of complaints
- Audit of complaint handling, including response times and quality
- Review of compliance with the Duty of Candour

Where internal governance separation is not possible, external review forms a core part of the governance framework.

INVESTIGATION PROCESS AND OBJECTIVITY

To ensure fairness and objectivity:

- The investigation will be undertaken or independently reviewed by an external individual where a conflict exists
- The Principal Dentist may provide factual information but will not act as the sole reviewer
- All findings and recommendations will be evidence-based and documented
- The complainant will be informed where independent review has been applied

Under no circumstances will the Principal Dentist act as the sole sign-off authority in complaints where they are the subject to ensure objectivity is maintained.

DATA PROTECTION COMPLAINTS

We recognise that individuals have the right to raise concerns about how their personal data is collected, used, stored, or shared. Any complaint relating to data protection will be taken seriously and handled in accordance with UK GDPR and Data Protection Act 2018 requirements.

HOW TO RAISE A DATA PROTECTION COMPLAINT

Patients, staff, or other individuals may raise a data protection concern:

- In writing, verbally, or via email/webform
- Through the practice's standard complaints process (see above)
- By contacting our Data Protection Lead directly at: Victoria.gamon@nhs.net

HANDLING PROCESS

- All data protection complaints will be logged and acknowledged within 3 working days.
- The concern will be investigated promptly, including review of relevant records, systems, and staff actions
- Where appropriate, this may be managed alongside (or as part of) a personal data breach investigation
- A written response will be provided in line with our general complaints process, outlining findings, actions taken, and any remedial measures

Data protection complaints will be assessed to determine whether they constitute a personal data breach under UK GDPR. Where a breach is identified, the practice will follow its Data Breach Protocol, including risk assessment and, where required, reporting to the ICO within statutory timescales.

OUTCOMES AND ACTIONS

Where a data protection issue is identified, we will:

- Take steps to mitigate any risk or harm
- Implement corrective actions (e.g. staff training, process changes)
- Consider whether the issue meets the threshold for reporting to the Information Commissioner's Office (ICO)

The practice will also consider whether the individual should be formally notified where there is a high risk to their rights and freedoms.

ESCALATION RIGHTS

Individuals may raise concerns with the practice in the first instance; however, they also have the right to lodge a complaint directly with the Information Commissioner's Office (ICO) at any time.

- Website: <https://www.ico.org.uk>
- Helpline: 0303 123 1113

We encourage individuals to raise concerns with us first so we can investigate and resolve the issue promptly.

CONFIDENTIALITY

All complaints are treated in the strictest confidence. Patient records will remain confidential, and only those involved in investigating or resolving your complaint will have access to the necessary information.

ACCESSIBLE INFORMATION

We ensure that patients receive information in formats they can understand and are provided with any communication support they need throughout the complaints process. We comply with the Equality Act 2010, and The Accessible Information Standards to ensure patients don't receive any discrimination based on protected characteristics.

COOPERATION WITH INDEPENDENT REVIEWS

The practice will cooperate fully with any independent review, investigation or complaint assessment undertaken by an external organisation, regulator, commissioner, ombudsman, indemnity provider or complaints body.

This includes providing relevant records, documentation, statements and information where lawful and appropriate to do so. The practice will implement any recommendations arising from independent reviews where appropriate and will use findings to support service improvement.

LEARNING FROM COMPLAINTS

We record all complaints centrally and regularly review them as part of our governance and quality improvement processes. This ensures we identify any trends, improve our services, and share learning across the team.

MONITORING THE COMPLAINTS PROCESS

The practice will monitor the effectiveness of its complaints system by reviewing:

- Number and type of complaints received
- Complaint response times
- Themes and trends
- Patient feedback
- Outcomes of investigations
- Learning and improvement actions
- Compliance with complaint handling timescales

Findings will be discussed during governance meetings and used to improve patient experience, safety and quality of care.

Where trends, recurring themes or significant concerns are identified, action plans will be developed, implemented and monitored to ensure improvements are made and sustain

TIME LIMITS FOR MAKING A COMPLAINT

Complaints should normally be made within 12 months of the incident or the date the issue came to your attention. However, we will always consider reasonable exceptions if there are valid reasons for the delay.

IF YOU ARE NOT SATISFIED

We hope that, if you have a problem, you will use our practice complaints procedure first. We believe this gives us the best chance to put things right and improve our services. However, if you remain dissatisfied, you may contact one of the following independent bodies:

The CQC: The CQC don't get directly involved with complaints made to the practice. They do, however, encourage giving feedback to service providers. To send feedback to the CQC please go to: <https://www.cqc.org.uk/give-feedback-on-care> Telephone: 03000 616161 (Mon to Fri, 8.30am - 5.30pm Excluding Bank Holidays)

The NHS: If you would rather not go directly to your practice, and your treatment is provided by the NHS, you can contact your local ICB, which is responsible for NHS dental services. The ICB can be contacted if you feel unable to raise your concerns with the practice. The ICB, however, cannot re-investigate the same complaints, and therefore, if you feel unhappy with how the practice or the ICB has handled a complaint, you should contact the Parliamentary and Health Service Ombudsman.

The Parliamentary and Health Service Ombudsman Telephone: 0345 015 4033 Website: <https://www.ombudsman.org.uk>

Private Patients: The Dental Complaints Service handles complaints made by private patients. Telephone: 0208 253 0800 (Mon-Fri, 9am-5pm) Website: <https://dcs.gdc-uk.org/>

The GDC Website: <https://contactus.gdc-uk.org/Complaint/Process/13>