

30 November 2001

Mrs Muriel Robinson  
Quality and Performance Improvement Unit  
Room 106  
Dundonald House  
Upper Newtownards Road  
BELFAST  
BT4 3SF

Dear Mrs Robinson

### **EVALUATION OF THE HPSS COMPLAINTS PROCEDURE**

The Southern Health and Social Services Council welcomes the opportunity to respond to the report. Many of its findings about the failings in the current NHS complaints system reflect the experiences of those who have sought our assistance to make a complaint.

Complaints have an important role to play in improving the planning and provision of health and social services. It is to be hoped that the Department will use this opportunity to put in place a more accessible and accountable system, and one that more effectively reflects the stated objectives of the HPSS Complaints Procedure.

The Southern Health and Social Services Council wishes to participate fully in taking forward the National Evaluation Report's findings and recommendations. We feel this should be facilitated by the establishment of a Regional Group made up of DHSS&PS, Boards, Trusts, Family Health Service Practitioners and service user representatives. The Regional Group would consider issues such as:

- Ensuring a standardised approach throughout the HPSS in relation to  
- the operation of the complaints procedure, performance standards and accountability,

- Information and publicity,
- Family Health Services,
- Resources – financial, time (administrative, professional and clinical) etc,
- Training and support,
- Conciliation,
- Addressing the issue of “independence” within the HPSS context.

### **General Issues**

- The Council has serious concerns about the length of time taken to resolve complaints. Protracted procedures can cause frustration and distress and often have a negative impact on resolution.
- Poor communication is a factor in many complaints – and an element in the levels of dissatisfaction with the complaints procedure. Communication and interpersonal skill should be included in professional and other training programmes for all health and social services staff.
- All staff, from consultants to cleaners, should be adequately trained to deal with complaints. Such training should be a compulsory part of induction and continuing education.
- It is unrealistic to expect effective complaints handling without investing in appropriate resources. There should be an evaluation of the resources required. Staff managing complaints must have adequate administrative and other support and have access to senior management.
- It is vital that sufficient resources are put into running an effective system at the earliest intervention point to ensure effective performance. Less discretion should be available to individual organisations to decide the functions of, and the resources available to, the complaints manager.
- The complaints procedure must be integrated into the clinical governance and quality framework of all HPSS organisations.

- ❑ Complaints about Family Health Services should be subject to the same procedures and monitoring systems as complaints about other services. Each primary care organisation should have the same levels of responsibility and adopt the same kinds of approach as other HPSS organisations. The present system for data collection on family health services complaints is wholly inadequate. It is impossible to monitor complaints handling or to identify trends.
- ❑ Those with responsibility for managing the performance of Chief Executives and Chairs should be required to demonstrate that complaints handling is an implicit part of the performance management framework.
- ❑ The board of every HPSS organisation should be held accountable for the performance of the organisation in handling complaints.
- ❑ Consideration should be given to the development of a Service Framework for the management of complaints.
- ❑ Measures should be taken to strengthen the independence and increase the powers of the Independent Review Panel.
- ❑ Steps should be taken to ensure more effective complaints handling by independent providers.
- ❑ Consideration needs to be given to the issue of children and young persons as complainants.
- ❑ In light of recent statements about the treatment of patients abroad, consideration needs to be given to how they will access the complaints procedure and how complaints will be followed up across country boundaries.

The Southern Health and Social Services Council looks forward to hearing from the Department as soon as possible.

Yours sincerely

Colette Hart  
Complaints Officer