



THE PLASTIC SURGERY GROUP

Complaints Policy

Document Control

A. Confidentiality Notice

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B. Document Details

Category:	General Administration
Author and Role:	Tom Horton, Managing Director
Responsible Person:	Tom Horton, Managing Director
Document Reference:	TPSG-GA-005
Current Version Number:	1.0
Current Document Approved By:	Tom Horton, Managing Director
Date Approved:	July 2018

C. Document Revision and Approval History

Version	Date	Version Created By:	Version Approved By:	Comments
1.0	July 2018	Tom Horton, Managing Director	Tom Horton, Managing Director	

Policy Statement

TPSG Ltd (“The Plastic Surgery Group”) aims to provide all clients with the highest standards of care and customer service. If we fail to achieve this, we listen carefully and respond to complaints swiftly, acknowledging any mistakes and rectifying them so that we can make improvements to our service. This policy aims to make it is easy for clients and/or their authorised representatives, who are dissatisfied with the service/treatment provided, to lodge a complaint or raise constructive criticism. Complaints are managed sympathetically within the framework set out in The Health and Social Care Act 2008 (Regulated Activities); the policy also applies to complaints about doctors and other healthcare professionals working within The Plastic Surgery Group.

- Clients are provided with a copy of The Plastic Surgery Group’s complaints policy summary (attached at Appendix 1) when they first raise a complaint, the summary is also displayed on the website.
- The Plastic Surgery Group considers all complaints to be of equal importance, whether written or verbal. Whilst written complaints are preferred. Responses at all stages are made quickly:
 - A written acknowledgement of the complaint is issued within 2 working days of receipt, unless a full reply can be sent within 5 working days if the investigation has been completed.
 - A detailed written response should be sent as soon as possible and within 20 working days of receipt of the Client’s complaint if the investigation has been completed.
 - Where there are delays and the investigation is still in progress, a letter must be sent to the Client explaining the reason for delay and a giving a realistic timeframe for providing a response.
- Every complaint will be thoroughly investigated and fair and proportionate remedies being considered

The Plastic Surgery Group has a 3 stage process for handling complaints:

The Clinic Manager, together with the person who knows the most about the client or speciality, deals with the complaint. Complaints of a serious nature (such as client injury) require the clinic staff to forward the relevant information within 48 hours of receipt of complaint to the Managing Director, Medical Director and responsible surgeon.

Stage 1: Local Resolution: Clinic Manager(CM) and Managing Director (MD)

Complaints should be raised directly with the Clinic Manager as soon as the matter first comes to the attention of the complainant and at least within 6 months with the exception of the complaint falling within the surgical terms and conditions. When a complaint is received via social media our aim is that the complainant is contacted by a member of personnel by phone within 2 hours and in the case of a written/verbal complaint, phone contact should be within 24 hours- with the aim of resolving the complaint at an early stage.

The approach to handling verbal complaints is that the member of staff who takes the call or is with the client tries to address their concerns there and then. If they cannot resolve the matter or subsequently

a letter is received, the Clinic Manager calls the client. The Clinic Manager listens and then agrees with client how they will proceed and/ or deals with the issue there and then follows this up with an email. If it still cannot be resolved, the Clinic Manager investigates and gets support from the Managing Director. Agreeing the way forward quickly, the Clinical Manager then calls the client to give this feedback and writes to them to confirm.

In all cases the Client should be invited to attend a meeting with the Clinic Manager and other relevant parties to talk through their concerns. Should the Client decline a meeting then the complaint should be followed up in writing only and the Client's wish not to attend a meeting should be noted in this correspondence. In general, all meetings & telephone conversations should be documented and followed up in writing to the complainant. The Clinic Manager will carry out an investigation into the case and respond directly to the complainant (following review and/ or investigation as appropriate by the Managing Director) whether the complaint was made verbally, by letter, text or email. Reasonable assistance should be given to anyone needing help to make a complaint (such as a language barrier or a disability). Clients may escalate their complaint to the next stage within 6 months of the most recent correspondence.

Stage 2: Complaint Review: The Plastic Surgery Group Managing Director (MD)

Clients who remain dissatisfied with the outcome of Stage 1 may request to have their complaint moved to Stage 2. Stage 2 review is conducted by the MD and they will carry out an investigation to form an independent view of the complaint and respond directly to the client either upholding or not upholding the complaint. Clients may escalate their complaint to the next stage within 6 months of the most recent correspondence.

Stage 3: Non-Surgical Patients : The Plastic Surgery Group Medical Director

Clients who remain dissatisfied with the outcome of the complaint handling review at Stage 2 can make a request in writing within 6 months to The Plastic Surgery Group Medical Director.

Stage 3: Surgical Patients: Independent external adjudication by the Independent Sector Complaints Adjudication Service (ISCAS) www.iscas.org.uk

Clients who remain dissatisfied with the outcome of the complaint handling review at Stage 2 can make a request in writing within 6 months of the final response to Stage 2 to ISCAS. ISCAS will only become involved if the first 2 Stages of the process have been completed as confirmed by The Plastic Surgery Group. The Plastic Surgery Group should also inform clients that it is their right to inform the following regulatory bodies:

Care Quality Commission (CQC) – England: 03000 616161 – www.cqc.org.uk

Medical Complaints

Surgeons, Doctors and Nurse Prescribers are independent practitioners and, as such, are not employees of The Plastic Surgery Group. Complaints regarding the outcome of any cosmetic procedure or any other issues concerning one of our independent practitioners should be addressed directly to the Clinic Manager of the clinic where the initial consultation was carried out who will follow the process outlined

above. The complaint is also forwarded to the Practitioner responsible for the client so that they can notify their indemnifiers, as well as the Managing Director and the Medical Director. The Practitioner who carried out the procedure is solely responsible for the results and it is therefore the Group's policy not to transfer care to another Practitioner. If the original Practitioner is no longer available or there are other extenuating circumstances involving the Practitioner, The Plastic Surgery Group reserves the right to review the basis upon which any additional surgery is provided.

Hospital Complaint

In the case of a complaint against the provider hospital, the complaint must be made in writing by the client (or authorised representative). All correspondence to and from the hospital must be via the Clinic Manager of the originating clinic who will forward the complaint to the hospital management and liaise with the client regarding their response. If a Client does not wish to write in then the Clinic Manager can request a feedback form from the hospital for the Client to complete and return.

The Plastic Surgery Group Personnel

Clinic Managers, a Senior Manager or a Director manages complaints arising from the activities of personnel employed by The Plastic Surgery Group; the information is recorded on The Plastic Surgery Group complaint database.

Vexatious Complaints

A complaint can be regarded as vexatious when it has been objectively investigated through the complete complaints process and found to be unjustified because the complainant is unreasonable not prepared to accept the conclusion and/or persists in making the same or a substantially similar complaint. Continuing to respond to such complaints can take up a significant amount of The Plastic Surgery Group's resources and can thereby detract from the service that can be provided for other clients. If a member of personnel considers that a complaint has become vexatious, the personnel member or practitioner can ask the relevant Director for support in dealing with the complaint. A Director, in consultation with the Managing Director or Chairman, may decide not to pursue the complaint any further and will inform the complainant of this.

Anonymous Complaints

Where a complaint of this kind is serious, then the member of personnel who receives the complaint should record the details and inform their manager and the Clinic Manager.

Records

Records of all complaints are confidential, and are treated as such. Clinic Managers monitor relationships with clients to ensure that any form of victimisation does not occur.

Personnel Concerns

Personnel have the right to express their concerns about questionable or poor practice to any senior manager or Director of the company, in compliance with the Public Interest Disclosure Act 1998. Personnel are assured that they will not be penalised at any time for complaining in good faith about poor practice. Please refer to The Plastic Surgery Group's Disclosure of Information in the Public Interest Policy and The Plastic Surgery Group whistle blowing policy.

Guidance for Personnel

Complaints should be dealt with in a timely and sensitive way; expressing regret that the complainant feels aggrieved may help reassure them that the issue is being taken seriously. No statement accepting responsibility or admitting liability should be made by any member of personnel until the investigation has been completed, The statement must also approved by the Managing Director and The Plastic Surgery Group’s Insurers. The Plastic Surgery Group ensures that personnel receive ongoing annual training in complaint management.

Compensation & Legal Action

In some cases an appropriate response might include an offer of a goodwill gesture. This may extend from free skincare products to a modest ex gratia payment. This will only be carried out if the Client accepts this in full and final settlement of their complaint. In the event of a monetary sum being offered the Clinical Manager and Managing Director must be contacted to advise on and approve the proposed payment. The Complaints policy does not prejudice the right of a Complainant to take legal action, however, if the Complainant indicates their intent to start litigation, then a goodwill gesture offer is not appropriate and any legal claim should immediately be referred to the Managing Director who will notify our insurers. In these circumstances the Complaints Policy will be applied and continues in the same way unless a ‘letter of claim’ is received at which time the complaint process will only continue (if appropriate) for the issues which are not covered by the legal action.

It is a condition of The Plastic Surgery Group’s insurance cover that, when claims regarding personal injury or damage to property are made, no admission of liability must be made as this may invalidate the company’s insurance. Complaints that relate to an insurance claim should instead be made to the Clinic Manager who will liaise with the Managing Director of The Plastic Surgery Group.

Reporting, audits and learning outcomes

All complaints must be entered on the clinic complaints spreadsheet and reported to the Managing Director.

Complaints are audited so that learning outcomes can be put into practice and reflected in corporate and local policy to assist in improving services. Clinic Managers audit complaints on a quarterly basis; this audit is reported to the Board. The Complaint Co-ordinator produces quarterly reports for the Executive team detailing complainants’ survey results, company, regional and clinic complaints, hospital complaints and Practitioner complaints.

Other Information

Contact details

THE PLASTIC SURGERY GROUP 100 Harley Street London W1G 7JA Tel : 0203 733 2069 E-mail : info@thepsg.co.uk	Care Quality Commission Citygate Gallowgate Newcastle NE 1 4PA Tel : 03000 616161 Email : enquiries@cqc.org.uk
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Appendix 1

The Plastic Surgery Group Complaint procedure summary

The Plastic Surgery Group aims to provide all clients with the highest standards of care and customer service. If we fail to achieve this, we listen carefully and respond to complaints swiftly, acknowledging any mistakes and rectifying them so that we can make improvements to our service. Clients are provided with a summary of The Plastic Surgery Group complaints procedure summary (displayed on the website) when they first raise concerns about any aspect of the service they have received.

Responses at all stages are made quickly:

- A member of staff will telephone the client within 24 hours of us being made aware of the complaint
- A full reply can be sent within 5 working days with a detailed written response sent within 20 working days
- A letter will be sent to the client advising of any delays at a minimum every 20 days

The Plastic Surgery Group has a 3 stage process for handling complaints:

The Clinic Manager, together with the person who knows the most about the client or speciality, deals with the complaint.

Stage 1: Local Resolution (Clinic Manager and Managing Director)

Complaints should be raised directly with the Clinic Manager as soon as the matter first comes to the attention of the complainant and at least within 6 months. When a complaint is received via social media our aim is that the complainant is contacted by a member of personnel by phone within 2 hours and in the case of a written/verbal complaint, phone contact should be within 24 hours- with the aim of resolving the complaint at an early stage.

If unresolved, the client will be invited to attend a meeting with the Clinic Manager and other relevant parties to talk through their concerns. All meetings & telephone conversations should be documented and followed up in writing to the complainant. The Clinic Manager will carry out an investigation into the case and respond directly to the complainant (following review by the Managing Director) whether the complaint was made verbally, by letter, text or email. Reasonable assistance should be given to anyone needing help to make a complaint (such as a language barrier or a disability). Clients may escalate their complaint to the next stage within 6 months of the most recent correspondence.

Stage 2: Complaint Review: The Plastic Surgery Group Managing Director

Clients who remain dissatisfied with the outcome of Stage 1 may request to have their complaint moved to Stage 2 where the complaint will be reviewed by the Managing Director. They will carry out an investigation to form an independent view of the complaint and respond directly to the client either upholding or not upholding the complaint, having discussed the case with a Director.

Stage 3: Non-Surgical Patients : The Plastic Surgery Group Medical Director

Clients who remain dissatisfied with the outcome of the complaint handling review at stage 2 can make a request in writing within 6 months to The Plastic Surgery Group Medical Director.

Stage 3: Surgical Patients: Independent external adjudication by the Independent Sector Complaints Adjudication Service (ISCAS) www.iscas.org.uk

Clients who remain dissatisfied with the outcome of the complaint handling review at Stage 2 can make a request in writing within 6 months of the final response to Stage 2 to ISCAS. ISCAS will only become involved if the first 2 Stages of the process have been completed as confirmed by The Plastic Surgery Group. The Plastic Surgery Group should also inform clients that it is their right to inform the following regulatory bodies:

Care Quality Commission (CQC) – England: 03000 616161 – www.cqc.org.uk