

**Action Plan to implement the Recommendations outlined in the  
'Complaints in the HSC Evaluation Report'**

<b>Recommendation</b>	<b>Action Taken</b>	<b>Status</b>
<p><u>Recommendation 1</u></p> <p>The DHSSPS should review the Guidance in order to provide greater clarity in respect of achieving more robust local resolution arrangements in order to ensure a better understanding by staff and service users</p>	<p>The DHSSPS has reviewed the Guidance to remove the word “enhanced”. Local resolution means, ‘the resolution of a complaint as close to the source as possible by way of the HSC Complaints Procedure’. The revised Guidance is now available on the DHSSPS internet site.</p>	<p>Complete</p>
<p><u>Recommendation 2</u></p> <p>The HSCB should consider co-ordinating training for HSC/FPS staff on a regional basis, as a method to improve the understanding of how more robust local resolution arrangements may be delivered, and improve recognition as to how and when to apply alternative techniques in the resolution of complaints</p>	<ul style="list-style-type: none"> <li>• The utilisation of an independent Lay Person, is one of the options available under the HSC Complaints Procedure to enable complaint resolution. The HSCB have hosted three training days for independent Lay Persons, at which the HSC Trusts were present. Training involved an explanation of the HSC Complaints Procedure, Information Governance Protocols and the SAI Procedure.</li> <li>• In 2014, the HSCB hosted its inaugural HSC Complaints Learning Event, which was attended by the DHSSPS, FPS, HSC Trusts, HSCB, the PHA, PCC and community and voluntary groups. The purpose of the event was to review what is meant by ‘local resolution’ and to review the roles and responsibilities of the complaints manager (recommendation 4).</li> <li>• This event will be conducted on an annual basis, at which topics such as communication, staff attitude and patients/service users’ stories will be discussed.</li> <li>• Training is provided to FPS by HSCB staff on an ‘ad hoc’ basis.</li> <li>• HSCB complaints staff attended a training day which focused on the honest broker role</li> </ul>	<p>On-going as part of normal business.</p>

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<p><u>Recommendation 3</u></p> <p>The DHSSPS should review the Guidance to provide a better understanding and provide clarification to HSC organisations and service users, as to the responsibilities of the various organisations in relation to complaints and more specifically the provision of support and advice to service users wishing to raise a complaint and regarding the sequencing of the complaints process.</p>	<p>The DHSSPS has reviewed the Guidance to clarify the role of PCC in relation to the resolution of complaints within 'Roles and Responsibilities'.</p> <p>The role of RQIA has been placed as an Annex to highlight its monitoring role in relation to inspecting standards and ensuring quality of care.</p>	<p>Complete</p>
<p><u>Recommendation 4</u></p> <p>The HSCB should, with HSC organisations seek to develop further definition and clarification with respect to the role of the Complaints Manager in order to provide a greater understanding and appreciation by staff and service users of the role in terms of providing support and advice</p>	<p>This recommendation was reviewed at the HSC Complaints Learning Event which was facilitated during June 2014. The purpose of the event was to review the implementation of recommendations 1, 2 and 4 and to answer any queries or concerns from attendees. This Event will take place on an annual basis.</p>	<p>On-going as part of normal business</p>
<p><u>Recommendation 5</u></p> <p>The HSCB should remind FPS Practitioners of their requirements under the Guidance and should make tangible efforts to ensure that FPS Practices are aware of and have access to the support</p>	<ul style="list-style-type: none"> <li>• Regular contact is made with Family Practitioner Services in which they are advised of support available to them and their requirements under the HSC Complaints Procedure.</li> <li>• Training is delivered by the HSCB to FPS on an ad hoc basis.</li> </ul>	<p>On-going as part of normal business.</p>

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<p>and advice that can be provided by the HSCB in respect of complaints resolution and implementation of the Guidance</p>	<ul style="list-style-type: none"> <li>• Training is provided to established forums on a regular basis, i.e. to the Practice Managers' Chairs. Annual training is carried out in association with NIMDTA.</li> <li>• Complaints literature has been revised highlighting the role of the HSCB and FPS requirements under the Complaints Guidance.</li> <li>• An E-Learning package has been developed for FPS, uptake of which is monitored and reviewed</li> <li>• A Complaints section has been developed for the HSCB website which holds complaints information, details of workshops, meetings and key contacts.</li> </ul>	
<p><u>Recommendation 6</u></p> <p>The HSCB should further develop and promote the role of 'honest broker' as a means to resolution of complaints within FPS, in order to provide greater clarity and understanding within HSC organisations, FPS and services users.</p>	<ul style="list-style-type: none"> <li>• A training package relating to complaints for FPS has been developed. The HSCB will monitor and review uptake of training.</li> <li>• The complaints literature has been revised to make explicit the HSCB's role in relation to complaints resolution and is available on the HSCB website.</li> <li>• The complaints section on the HSCB website has been updated. This section will highlight upcoming workshops, minutes of meetings, complaints literature, training packages and contact details for staff.</li> </ul>	<p>Complete</p>
<p><u>Recommendation 7</u></p> <p>HSC organisations should ensure that they comply with the Guidance to improve their communications with service users who have made a complaint by</p>	<p>All Trusts have indicated that they provide clear lines of communication with the complainant, ensuring that they are updated in relation to the progress of their complaint and in particular if the timescale for a response will not be met. All forms of communication are recorded and monitored.</p>	<p>Complete</p>

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<p>developing processes to maintain regular proactive contact with users. This system should include the ability to provide users with a rationale for not being able to respond within the agreed timescales, detail of progress, a projected timescale for completion of investigation and/or timescales for issue of the response</p>		
<p><u>Recommendation 8</u></p> <p>Recognising the practical difficulties in ensuring all staff receive mandatory complaints training, and in an attempt to increase the staff uptake in this requirement, HSC organisations should explore the further roll out of the current e-learning complaints training package. The HSCB should also ensure that this includes FPS Practices.</p>	<ul style="list-style-type: none"> <li>• An E-Learning package has been developed by HSCB for FPS.</li> <li>• All Trusts have indicated that they provide complaints awareness training to all staff. Training is also provided upon request.</li> </ul> <p><u>E-Learning</u></p> <ul style="list-style-type: none"> <li>• The SEHSCT and BHSCT have implemented an e-learning package which is available on the Trusts intranet site. Uptake of training is monitored and reviewed on a regular basis. Trusts are currently looking at ways to encourage uptake.</li> <li>• The NHSCT have developed an e-learning package which will be implemented during 2013/14.</li> <li>• The SHSCT, WHSCT and NIAS are currently giving consideration to the introduction of an e-learning package. HSCB will liaise with the SHSCT, WHSCT, and NIAS to ensure</li> </ul>	<p>Complete</p>

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	<p>that e-learning packages are in place and the uptake of training is encouraged.</p> <ul style="list-style-type: none"> <li>• NIAS have indicated IT packages, will be implemented to non-front line staff in the first instance. It has acknowledged that more work is required regarding the feasibility of enabling front line staff to access e-learning packages.</li> </ul>	
<p><u>Recommendation 9</u></p> <p>HSC organisations and FPS Practices should ensure that where changes to policy, procedure, or improvements to services have occurred as a result of a complaint being raised, the service user is informed of this within the response to them, including details regarding implementation of associated actions plans, etc, where appropriate;</p>	<ul style="list-style-type: none"> <li>• All Trusts have indicated that any learning arising from a complaint is communicated to the complainant within the response. Trusts have a clear focus upon learning and pro-active engagement with patients.</li> <li>• The SEHSCT and WHSCT develop newsletters highlighting any specific learning which has occurred as a result of a complaint.</li> <li>• The WHSCT, SEHSCT and BHSCT develop learning reports. The SEHSCT have a 'Lessons Learned' subcommittee in which any learning arising from complaints is reviewed and disseminated across the organisation.</li> </ul>	<p>Complete</p>
<p><u>Recommendation 10</u></p> <p>A regionally agreed method of disseminating learning from complaints should be developed by the Board and Public Health Agency (PHA). This should include the co-ordination of an Annual Regional Complaints Workshop event and agreed ad hoc/ scheduled communications, such as Newsletters etc.</p>	<p>Trusts submit substantive learning from complaints to a central repository for inclusion within a Learning Newsletter, called 'Learning Matters'. This newsletter will include learning arising from AIs, SAIs and Early Alerts.</p>	<p>On-going as part of normal business.</p>

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Recommendation 11

A regional mechanism for receiving user satisfaction feedback in relation to complaint resolution should be developed by HSC organisations, recognising the sensitivities involved in such as area. The HSCB/PHA should lead on this with input from the PCC, the Trusts and service users. Consideration should be given to engaging with key stakeholders in this regard through focus groups across the Trust/ Local Commissioning Group areas.

- A pilot service user workshop took place 4 February 2013 in Craigavon Civic Centre. It was facilitated by Mrs Liz Fitzpatrick, Complaints and Litigation Manager (HSCB) and Mr Michael Cruikshanks, Deputy Complaints Manager (HSCB). The workshop also had representation from the Patient and Client Council. Initial feedback from service users would indicate that there is still further effort required to raise awareness of how to make a complaint.
- A regional event took place in Belfast on 14 May 2013 which was facilitated by the HSC Leadership Centre. The aim of which was to ascertain how the public believe that a regional mechanism for receiving feedback can be created.
- Key themes arising from the event included; the importance of monitoring and learning; accessibility; accountability; communication; support; resolution and learning from complaints.
- To address feedback from service users, the HSCB facilitated a communication/awareness campaign during the month of June 2014, specifically demonstrating to service users, 'how to make a complaint' and 'their right to complain'. This included a public focus group in the Western Trust area and a HSC Complaints Learning Event. In addition, a new Complaints 'Signposting' leaflet was developed and distributed at Complaints Awareness Posts which were facilitated across Northern Ireland in non-healthcare facilities. This leaflet was shared with service users and amended following feedback.
- In 2015, a workshop regional workshop was hosted specifically for 'older persons'. To raise awareness of the workshop the HSCB liaised with specific groups, to include; The Pensioners Parliament, Age NI, the Greater Belfast Senior Citizens Forum and Engage with Age.

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<p><u>Recommendation 12</u></p> <p>Recognising that communication, staff attitude and behaviour are among the highest categories of complaints received across the HSC, innovative methods in attempting to address this at the core of staff/service user interactions should be explored led by the PHA and the Board;</p>	<p>The HSC Leadership Centre have developed a training package for all staff within the HSC, to enforce the importance of communication and staff attitude.</p> <p>It is apparent the majority of complaints received across primary and secondary care relate to poor staff attitude/behaviour and communication, therefore this theme, along with privacy and dignity will be reviewed by the DHSSPS Quality 2020 Group.</p>	<p>On-going as part of normal business</p>
<p><u>Recommendation 13</u></p> <p>Regional discussions, led by DHSSPS, regarding the 20 working day response timescale. Any discussions and agreements should include clarification of the timescales associated with honest broker complaints</p>	<p>The timescales for responding to complaints have remained the same. The Guidance however has been revised to highlight that 'honest broker' complaints should be responded to within 20 working days.</p>	<p>Complete</p>
<p><u>Recommendation 14</u></p> <p>HSC Organisations should review their Complaints Policies and Procedures to reflect any clarification/amendment to the Guidance</p>	<p>Complaints Policies and Procedures have been revised in line with the Complaints Guidance.</p>	<p>Complete</p>