

Policy: Management of Consumer Related Complaints and Feedback

Purpose

This policy outlines expectations in relation to the management of all consumer (see definition) related complaints and feedback received by Te Whatu Ora – Health New Zealand Te Whatu Ora Counties Manukau District.

The purpose of this policy is to:

- Ensure that consumer (see definition) complaints and feedback are addressed in an empathetic, professional, timely and in a consumer centric manner.
- The complaints service is accessible, well publicised, open and transparent
- Ensure staff are empowered to deal with complaints as they arise in an open and non-defensive way
- The learnings from complaints are identified and used for improvement
- The complaints procedure is supportive for those who find it difficult to complain



Note: This policy must be read in conjunction with the [Complaints Resolution and Management of Consumer Feedback procedure](#)

Scope of Use

Applies to all staff employed by Te Whatu Ora Counties Manukau, including any trainee/student undergoing instruction, or any person contracted to provide a service on any Te Whatu Ora Counties Manukau worksite.

Roles and Responsibilities

Executive Leads

- Chief Medical Officer – The owner of the complaints process (including the HDC and complaints received through the Te Whatu Ora Interim District Directors office)
- Chief Nurse and Director of Patient & Whaanau Experience – Visibility of major complaints.
- Executive Professional Leads - Visibility of all moderate and major complaints relating to professional groups.

Feedback Central

- Feedback Central has overall responsibility for ensuring the effective governance of all feedback, including complaints and compliments process across Te Whatu Ora Counties Manukau services using the SafetyFirst feedback and incident reporting system. This includes coordination, expert advice and support for investigations, timely resolution, communication and highlighting the improvements to be made.
- Monitor and report on the completion of the corrective action plans and facilitate organisational learnings from complaints and compliments.

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- Ensure all relevant professional leads (Associate Directors Allied Health/Clinical Directors/Clinical Nurse Directors/Director of Midwifery) are informed of the serious complaints.
- Provide themes, learnings, examples and advice to relevant services and committees (e.g. Clinical Governance Group (CGG)) to promote improvement
- Inform the Patient Experience Lead and the Patient Safety Quality Assurance Lead of feedback relating to themes specifically relevant to areas of improvement.

Clinical Director/ General Manager/ Divisional Lead

- The Clinical Director/General Manager of the Division has overall responsibility for ensuring the effective management of complaints and compliments.
- This includes designating a staff member within the division who will help keep oversight of complaints for their division (usually a Clinical Quality Risk Manager (CQRM) or Clinical Quality Co-ordinator (CQC)) and ensure timely investigation, coordination of response, communication, and service improvement.
- When causative/contributory factors are identified, they must be documented and the General Manager (or delegate) must allocate responsibility for developing and implementing a corrective action plan and checking that the action taken has been effective.
- Organisational complaint management timeframes must be adhered to.
- Complaint, enquiries and compliment data will be analysed for learning.
- There must be a feedback process for the staff so that learning can take place from complaints, enquiries and compliments.

Staff

- All staff have a professional and ethical responsibility to respond positively and with empathy to complaints and feedback. Relevant line managers are to be advised of complaints and compliments as soon as they are received.

Feedback Definition

Information provided to the organisation by the consumer regarding their experience with us. This could be provided via complaints, compliments, enquiries or suggestions.

- **Complaint:** A complaint is any expression of dissatisfaction that needs a response from the organisation. If the consumer believe they have a complaint, then it is a complaint.
- **Compliment:** A compliment is an expression of praise, commendation or admiration about staff and/ or a service.
- **Enquiry:** A question or request for clarification of information or process
- **Suggestion:** A remark provides information on how to change or improve care or services

Policy Statements

- Te Whatu Ora Counties Manukau operates a centralised complaints and compliments process through the Feedback Central team to provide a central point of contact and coordination to ensure consumers experience a seamless resolution process.

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- Te Whatu Ora Counties Manukau is committed to the timely resolution of concerns that consumers raise. Complaints and compliments are welcomed and viewed as an opportunity to improve and monitor the quality and experience of our services.
- Consumers do not have to put their complaints in writing to have their concerns acted on or logged.
- Effective and timely communication with consumers is essential throughout the complaint management process.
- Te Whatu Ora Counties Manukau encourages the resolution of minor concerns when they are raised at the point of care. However, if it is not possible to resolve the concern immediately, then the complaint process must be followed.
- All complaints and compliments received must be logged into the Safety First (Feedback reporting system) as soon as practicable.
- Any communication with the media in relation to complaints will be undertaken by the Interim Director, Chief Medical Officer (CMO) and Communications General Manager or delegate.
- At all times consumer privacy and confidentiality must be maintained, and Te Whatu Ora Counties Manukau's Privacy Policy requirements met. No patient information should be provided to third parties (including whaanau) without the authorisation of the patient.
- Complaints and responses to complaints should not form part or be recorded in the clinical records of a patient and should be documented only in the SafetyFirst Feedback reporting system.

Complaint Grading

On receipt, all complaints (with the exception of HDC complaints) are graded by the Feedback Central team based on the information contained in the complaint, the source and the impact on the consumer (Appendix 1). These are graded as Major, Moderate and Minor complaints. The grading can be changed (escalated/de-escalated) after further investigation, if required. The Feedback Central Team should be notified if the grading of a complaint needs to be changed

Source of Feedback

Feedback can be received through multiple channels such as feedback forms, letters, Te Whatu Ora Counties Manukau website, emails, telephone, after communication with any staff member or via patient experience surveys.

- All complaints received from external agencies (e.g. Health and Disability Commissioner (HDC), MP's, Privacy Commissioner) should be classified as high priority (Major) and timelines mentioned in the communication are to be strictly adhered to. An extension can be requested if needed.
- All requests for information from Coroners and the HDC office should be logged into SafetyFirst as an enquiry and they should be classified as high priority (Major) and timelines mentioned in the communication are to be strictly adhered to. An extension can be requested if needed.

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Open Communication

Te Whatu Ora Counties Manukau has a policy of open communication and this approach is to be reflected in the complaint investigations and responses, including the provision of empathetic and sincere apologies where indicated.

Resolution Timeframes

All complaint responses must be managed within the timeframes set out in the Te Whatu Ora Counties Manukau Complaints Resolution and Management and Consumer Feedback Procedure.

Staff Support

In line with the organisations [Just Culture policy](#) staff are to be supported by the division during the complaint investigation process and have the option for their legal representative body, such as the Medical Protection Society (MPS) or New Zealand Nurses Organization (NZNO), to review their response to a complaint on their behalf.

The staff can also seek support from the Employee Assist Programme (EAP) as required through the course of a complaint investigation. Assistance can also be sought from the Feedback Central team.

Storage and Confidentiality of Complaint Information

Complaints and any associated documentation are to be stored securely under conditions that comply with Te Whatu Ora Counties Manukau Information policies, the Privacy Act 2020, the Health Information Privacy Code and the Public Records Act 2005. The complaint correspondence is generally not to be filed in the consumer's clinical record unless requested by the consumer.

Reporting

The Feedback Central Manager will disseminate quarterly feedback report reports to all the ELT members and the relevant divisions. The reports will indicate the themes of feedback, the complaints statistics and the resolution timeframes. It is expected that these reports along with the recommendations arising from complaints will help the organisation to learn from complaints and use them for improvement.

The data from Feedback can also be used as a rationale for projects across the organisation which focus on improvement and learning.

The Feedback Central team will also disseminate fortnightly compliments reports to the designated staff member within the divisions. A monthly report is also sent to the Communications team to include the Te Whatu Ora Counties Manukau Daily Dose newsletter.

Definitions

Terms and abbreviations used in this document are described below:

Term/Abbreviation	Description
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Consumer	A person receiving care/treatment from CM Health. This could also be a whaanau related to the person receiving the care or a Kaitiaki (visitor) or a member of public who came into the hospital.
Third party complaints	Complaints made by people other than the patient about the care provided to the patient e.g. whaanau, Kaitiaki, GPs/community providers or members of the public
Corrective Action Plan	Refers to recommendations developed following an investigation into a complaint that improves care delivery and prevents reoccurrence of problems.
SafetyFirst	Feedback Reporting System for all complaints, enquires, comments, or compliments. Used for the tracking of information including automatic electronic alerts to assist in achieving target timeframes, reporting and to monitor compliance.

Associated Documents

Other documents relevant to this policy are listed below:

NZ Legislation /Standards	The Health and Disability Commissioner’s Code of Health & Disability Services Consumers’ Rights Regulations 1996 (Code of Rights) Privacy Act 2020 Health Information Privacy Code 2020 Public Records Act 2005 Official Information Act 1982 Health and Safety at Work Act 2015 Health Practitioners Competency Assurance Act 2003 Coroners Act 2006 The Mental Health (Compulsory Assessment and Treatment) Act 1992 Nga Paerewa Health and Disability Services Standard NZS 8134:2021
CM Health Documents	Procedure: Consumer Related Feedback and Complaints Policy Open Disclosure with Patient’s Policy Policy: Incidents Reporting and investigation Procedure: Incidents Reporting and management Policy: Media Policy: A Just Culture Procedure: Checking for Accuracy and Authorising Entries into the Clinical Record Procedure: Correcting and Altering Personal Health Information at the Patient’s Request Procedure: Correcting Inaccuracies in the Clinical Record Policy: Disclosure of Health Information Procedure: Disclosure Of Health Information -How A Third Party Requests Personal Health Information About A Patient

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Appendix 1

Complaints Grading

- Minor: Resolution is straightforward consisting of a follow up with the service, an explanation, clarification of policy or procedure or an apology to the consumer / whaanau (e.g. no system issue is identified).
- Moderate: Resolution requires investigation, and may require meetings with consumer, whaanau and other providers, and corrective actions.
- Major: Resolution requires extensive investigation, meetings with consumers / whaanau and other providers, extensive corrective actions or reporting of event to regulatory body or authority.

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