



## British College of Aesthetic Medicine Member Complaints Policy April 2013

### **Introduction:**

- (1) This is the Member Complaints Policy of The British College of Aesthetic Medicine (“the College”)
- (2) This Policy has been adopted by the Board in accordance with Article 23(1) and 30 of the Articles of Association of the College (“the Articles”).
- (3) This Policy supplements the Articles and the Administrative and Member Conduct Regulations of the College.
- (4) Words and phrases defined in the Articles shall have the same meaning in this Policy where the context so permits.
- (5) Should any inconsistency or conflict arise between this Policy and any other College Regulations, this Policy shall prevail so as to give effect to this Policy.
- (6) This Policy applies to Members (Associate, Full, Fellow and Life) of the College.
- (7) The aims of this policy and procedure is that complaints made by service users or their representatives are listened to and acted upon effectively by:
  - (a) having systems in place to deal with comments and complaints, including providing people who use services with information about that system.
  - (b) supporting people who use the services and their nominated representatives to make comments or complaints.
  - (c) considering fully, responding appropriately and resolving, where possible, any comments or complaints.

### **Accessibility of Comments and Complaints Policy:**

- (8) Members will make the Complaints Policy accessible to patients and relatives:
  - (a) A copy of the *Procedure for Handling and Investigating Complaints* will be displayed in the reception area and on any website advertising the service.
  - (b) Staff will provide help to any patient or relative of any patient who wishes to make a complaint.
  - (c) A copy of the *Procedure for Handling and Investigating Complaints* will be provided to any patient or patient’s relative on request.



**Staff Training on Complaints Management:**

- (9) All staff (including those with practising privileges) will receive a copy of the Complaints Policy and will receive training on management of complaints and complaints handling process at the time of induction.

**Definition of a Complaint:**

- (10) A complaint is an oral or written expression of dissatisfaction about any matter reasonably connected with the services provided by a Member or another member of staff.
- (11) A complaint which is made orally and is resolved within 24 hours will be recorded as locally resolved in the Complaints Register.

**Timescales for Handling and Investigating Complaints:**

- (12) All complaints will receive a written acknowledgment within 2 working days of receipt (unless a full reply can be sent within 5 working days).
- (13) A full response will be made within 20 working days of receipt of the complaint (if this not possible a letter, explaining the reason for the delay will be sent to the complainant and a full response will be made within 5 working days of the conclusion of the process).

**Notification of Outcome of Complaint:**

- (14) Complainants will be notified of the outcome of their complaint and any actions taken as a result of the complaint immediately upon conclusion of the process.

**Complaints Register:**

- (15) A register will be kept of complaints containing the following information;
- (a) Date of complaint
  - (b) Name of complainant
  - (c) Nature of complaint and details of staff involved
  - (d) Action taken to investigate the complaint
  - (e) Outcome and action taken as a result of the complaint
  - (f) Date of full response to complainant
- (16) The register shall be kept for 5 years from the date of the last entry



**Records of Complaints:**

- (17) All correspondence relating to a complaint will be kept for 5 years.
- (18) A register will be kept of all complaints including appropriate details, including outcome.
- (19) A quarterly audit of complaints will be produced detailing the nature and outcomes of complaints and a quarterly summary of complaints will be sent to the College and shall include:
  - (a) Number of complaints received
  - (b) Nature of complaints and details of staff involved
  - (c) Resolutions of complaints
  - (d) Actions taken in response to complaints
  - (e) Details of any complaints relating to Members which have progressed to litigation or to GMC hearings.

**Procedure for Handling and Investigating Complaints:**

- (20) The procedure given in Appendix 1 to this Policy shall be adopted by all Members of the College and shall be reproduced with the Member's or the Member's organisation's details in the appropriate areas.
- (21) The organisation will nominate a person to receive complaints and who will conduct an investigation and gather information
- (22) Complaints must be addressed in writing to the nominated person.
- (23) The investigation will result in the production of full written report being produced and made available to those concerned.
- (24) The investigation will include:
  - (a) Speaking to all persons concerned
  - (b) Reviewing records and other documents
  - (c) Producing a written summary of the facts of the complaint
  - (d) Producing responses to written complaints
  - (e) Completing the appropriate records of the complaint
  - (f) Informing all relevant parties as to the outcome of the complaint and any remedial action.



## Appendix 1 – Procedure for Handling & Investigating Complaints

### Procedure for Handling and Investigation of Complaints

#### Introduction:

All complaints will be dealt with quickly and effectively between the individuals concerned and any justified grievances will be promptly remedied. The aim of this procedure is to resolve complaints locally to a satisfactory conclusion wherever possible.

Any complaints of unprofessional conduct against a doctor will be referred to the General Medical Council. Complaints about nursing staff will be referred to the Nursing and Midwifery Council.

Patients should be aware that if they wish to register a complaint they should in the first instance address it in writing to:

Dr Ed Porter  
Somerset Cosmetic Clinic  
23a Bridge St,  
Taunton  
Somerset  
TA1 1TQ

#### Procedure for Handling of Complaints:

- All complaints will be fully investigated by Dr Ed Porter.
- All complainants will receive a written acknowledgement within **2** working days of the complaint being received.
- The complainant will receive a written response within **20** working days or a written explanation of why the response is taking longer and when they can expect a response. A full response being made within **5** working days of a conclusion being reached.
- All staff involved in a complaint will be informed of the outcome and any appropriate advice on preventing recurrence.
- On completion of a complaint a full written report will be made including any recommendations and actions by Dr Ed Porter.
- Where a complainant is not satisfied at the conclusion of the complaint process they have several options depending upon the nature of the complaint:
  - a. Where a complaint may relate to be a breach of the Articles, Regulations or Policies of the British College of Aesthetic Medicine or where it refers to a matter concerning the conduct or performance of a member who has a legally prescribed connection to the College as their Designated Body, patients may raise their concerns directly with the College within 21 days of the conclusion of the local process (see below)<sup>1</sup>.
  - b. Where the complaint may relate to a breach of professional standards of conduct, clinical competence or fitness to practise, patients can raise their concerns with the appropriate professional regulator (Doctors – General Medical Council, Nurses – Nursing & Midwifery Council (see below)
  - c. Where the complaint relates to a breach of statutory regulations and the organisation is registered with the Care Quality Commission patients can contact the CQC (see below)<sup>2</sup>.
  - d. Patients retain the option of seeking legal advice relating to a complaint about the service provided by any healthcare provider.



**Contact Details:**

<b>Organisation:</b>	
The Secretary, <b>The British College of Aesthetic Medicine</b> Shorne Village Surgery Crown Lane Shorne Kent DA12 3DY	Tel: 01474 823900 Web: <a href="http://www.cosmeticdoctors.co.uk">www.cosmeticdoctors.co.uk</a>
<b>The General Medical Council</b> 350 Euston Road London NW1 3JN	Tel: 0161 923 6602 Web: <a href="http://www.gmc-uk.org">www.gmc-uk.org</a>
<b>The Nursing &amp; Midwifery Council</b> 23 Portland Place London W1B 1PZ	Tel: 0207 7333 9333 Web: <a href="http://www.nmc-uk.org">www.nmc-uk.org</a>
<b>The Care Quality Commission</b> Citygate Gallowgate Newcastle upon Tyne NE1 4PA	Tel: 03000 616161 Web: <a href="http://www.cqc.org.uk">www.cqc.org.uk</a>

**Notes:**

1. The British College of Aesthetic Medicine is not a professional regulator for its Members; it does however have the power to investigate concerns relating to the conduct or performance of some members with which it has a legally prescribed connection in relation to GMC relicensing and revalidation. The College will review all complaints which it receives and consider whether it relates to a matter which is within the College's remit. If the College is unable to look at the complaint, the complainant may be referred to the appropriate regulator or agency.

2. The Care Quality Commission is the regulator for independent Healthcare. The Care Quality Commission has no statutory powers to investigate any complaints that patients or other members of the public make about independent healthcare services, nor do they have a regulatory role to manage, arbitrate or resolve their complaints, concerns or allegations. However, they will take account of all information that they receive from the public about registered independent providers, or about unregistered providers that they consider should be registered. They assess whether this 'concerning information' suggests that:

- An offence has been committed as set out in the Health & Social Care Act 2008
- A regulation has been breached as set out in the associated regulations, or
- The provider has contravened a condition of their registration with us, as set out in their registration certificate.

If they suspect that the provider has committed an offence under the Act or a breach under the regulations, they are required to take action to bring about improvement.

**Staff will provide help to any patient or relative of a patient wishing to make a complaint.**