

Lister House Complaints, Suggestions and Compliments Policy

Introduction

1.1 About Lister House Surgery

Lister House Surgery is committed to providing safe, effective, respectful and compassionate care for all patients. We recognise that feedback, whether positive or negative, is an important part of understanding what works well and where improvements may be needed.

We aim to listen openly, respond in a timely and fair way, protect confidentiality and treat everyone involved in the feedback or complaints process with dignity and respect.

This policy applies across all Lister House Surgery sites and to all members of the practice team who may receive, record, investigate, respond to or learn from feedback.

Lister House Surgery Values

In managing compliments, complaints, suggestions and feedback, Lister House Surgery aims to:

- Listen to patients, carers and representatives with courtesy, empathy and respect.
- Take concerns seriously and respond in a fair, open and proportionate way.
- Protect confidentiality and handle information in line with UK GDPR and data protection requirements.
- Use feedback to identify learning, improve services and strengthen patient experience.
- Recognise and share compliments so that good practice is celebrated and embedded.
- Offer reasonable adjustments and accessible formats where needed.
- Maintain a culture of openness, learning and continuous improvement across the Practice.

Relevant Legislation and Guidance

This policy is informed by, and should be read alongside, relevant legislation, national guidance and regulatory requirements including:

- **The Local Authority Social Services and National Health Service Complaints (England) Regulations 2009** – sets out the statutory requirements for handling NHS complaints, including who may complain, time limits, acknowledgements, investigation, response, publicity, monitoring and reporting.
- **Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 16: Receiving and acting on complaints** – requires providers to operate an effective and accessible system for identifying, receiving, recording, handling and responding to complaints, and to take proportionate action where failings are identified.
- **Health and Social Care Act 2008 (Regulated Activities) Regulations 2014, Regulation 20: Duty of Candour** – requires openness and transparency with

patients when certain notifiable safety incidents occur, including appropriate apologies and explanations where applicable.

- **UK General Data Protection Regulation and Data Protection Act 2018** – require personal information, including complaints records and patient information, to be processed lawfully, fairly, securely and transparently.
- **Common Law Duty of Confidentiality** – requires confidential patient information to be protected and only shared where there is an appropriate lawful basis, consent, overriding public interest or other valid justification.
- **Equality Act 2010** – requires the practice to consider reasonable adjustments and ensure that patients, carers and representatives can access the complaints process fairly and without discrimination.
- **NHS Constitution for England** – confirms patients' rights to have complaints acknowledged, properly investigated and to receive a response, and to take complaints to the Parliamentary and Health Service Ombudsman where they remain dissatisfied.
- **Parliamentary and Health Service Ombudsman NHS Complaint Standards** – provides guidance on good complaints handling, including being welcoming, thorough, fair, learning-focused and transparent.
- **Care Quality Commission guidance and GP Mythbuster 103: Complaints Management** – outlines CQC expectations for GP practices in acknowledging, investigating, responding to and learning from complaints.

Lister House Surgery will ensure that complaints, suggestions, compliments and feedback are managed in a way that is fair, accessible, confidential, proportionate and focused on learning and improvement.

Scope

This policy applies to the handling of complaints, suggestions, compliments and feedback received by Lister House Surgery across all practice sites and services.

- **Roles affected:** All staff working at or on behalf of Lister House Surgery, including clinical, administrative, management, reception, care navigation, patient services, temporary, locum and contracted staff.
- **People affected:** Patients, carers, guardians, representatives and those acting on behalf of patients where appropriate consent or lawful authority is in place.
- **Key facts – people affected by the service:** People affected by the service may include patients, carers, guardians, family members, advocates, representatives and others who are directly or indirectly affected by the care, treatment, decisions, actions or omissions of Lister House Surgery. Where a complaint or concern is raised on behalf of a patient, appropriate consent, lawful authority or best-interest considerations must be established before information is shared or investigated in detail. People affected by this service should be aware that they have the right to make a complaint, raise a concern, make a suggestion or give a compliment. The process of making a complaint or giving any kind of feedback is straightforward. Feedback may be provided anonymously, unless the person giving feedback consents for the issues raised or feedback provided to be shared more widely than the relevant members of the practice team. All feedback is explored to help improve the quality of care and the experience of people using Lister House Surgery. Patients may also contact their local Integrated Care Board (ICB) for complaints about primary care services, including GPs, dentists, opticians or pharmacists, and secondary care services such as hospital care, mental health services, out-of-hours services, NHS 111 and community services such as district nursing. Each ICB will have its own complaints procedure, which is often displayed on its website. There are a number of

ways to provide feedback of any kind or to make a complaint and receive a response from Lister House Surgery.

- **Stakeholders affected:** External health professionals, partner organisations, NHS Integrated Care Board (ICB), Care Quality Commission (CQC), and any other relevant external agencies involved in the complaint, feedback, learning or regulatory process.

Aims and Objectives

- 1.2 Establish a system for complaints, compliments, suggestions and feedback that informs patients about how their views are heard, how procedures work and why feedback matters to Lister House Surgery in ensuring quality care and an excellent patient experience.
- 1.3 Run an effective system for using compliments and feedback to identify good practice, strengths, weaknesses and areas for improvement, while highlighting what Lister House Surgery does well.
- 1.4 Operate an effective system for the management of patient complaints that leads to the identification of areas for improvement, lessons learned and positive change.
- 1.5 Ensure that Lister House Surgery has an effective system in place to manage data protection complaints.
- 1.6 Ensure that all team members are trained and supported in the facilitation of complaints procedures and are fully compliant with their own professional and obligatory requirements within their scope of practice.
- 1.7 Ensure that patients, carers, guardians and representatives know how to raise a complaint, suggestion, compliment or feedback, and that the process is accessible, clear and easy to use.
- 1.8 Acknowledge complaints and feedback in a timely manner and ensure that complainants are kept informed, where appropriate, throughout the process.
- 1.9 Investigate complaints fairly, objectively and proportionately, ensuring that responses are based on the information available and that confidentiality is maintained.
- 1.10 Provide clear, compassionate and professional responses that explain the outcome of the investigation, any learning identified and any actions taken where appropriate.
- 1.11 Ensure that all learning from complaints, suggestions, compliments and feedback is shared with relevant teams and used to support service improvement, staff learning and patient safety.
- 1.12 Monitor themes, trends and outcomes from complaints and feedback through appropriate governance processes, including reporting to relevant committees or meetings where required.
- 1.13 Maintain an effective method of identifying and monitoring complaint patterns, trends and themes, and share relevant learning with NHS England, the local Integrated Care Board (ICB), patients and stakeholders where appropriate.
- 1.14 Promote and implement an open and honest culture in which complaints, suggestions, compliments and feedback are welcomed, responded to constructively and used to support continuous learning and improvement.
- 1.15 Ensure complainants are informed of their right to escalate their complaint to the Parliamentary and Health Service Ombudsman if they remain dissatisfied following the practice's final response.

Policy Accessibility and Availability

Lister House Surgery is committed to ensuring that this policy and the complaints process are accessible, understandable and available to all patients, carers, guardians, representatives, staff and relevant stakeholders.

- **Patient access:** Patients will be provided with information about how to make a complaint, the complaints process and expected timescales through the patient leaflet, the practice website and information available within the surgery. Information will be provided in appropriate or specifically requested accessible formats where practicable.
- **Accessible formats:** The practice will support reasonable requests for this policy, complaints information or related correspondence to be provided in accessible formats, such as large print, plain English, translated information or other suitable formats where practicable.
- **Reasonable adjustments:** Reasonable adjustments will be considered in line with the Equality Act 2010 to support individuals who may need help to access or use the complaints process.
- **Staff access:** All staff will have access to the current version of this policy and will be made aware of their responsibilities for receiving, recording, escalating, investigating, responding to and learning from complaints and feedback.
- **Stakeholder access:** Relevant external stakeholders, including NHS England, the local Integrated Care Board (ICB), the Care Quality Commission (CQC) and external health professionals, may be provided with information from this policy where appropriate and in line with confidentiality and data protection requirements.
- **Policy review:** The policy will be reviewed in line with the review date in the document control section, or sooner if there are changes to legislation, national guidance, organisational processes or learning from complaints and feedback.
- **Duty of Candour:** The practice understands its statutory obligations in respect of the Duty of Candour and will follow agreed policy and procedure where this applies.

Lister House Surgery will ensure that complaints are acknowledged, recorded, investigated and responded to in a timely, fair and compassionate way. All complaints will be directed to the designated complaints lead or nominated manager. The GP Partners responsible for complaint oversight are Dr Mahya Johnson and Dr Iram Afshan.

Lister House Surgery recognises that failure to deal with a complaint appropriately is a serious matter and may be considered a breach of the General Medical Services contract. The practice is committed to ensuring that complaints are managed consistently, equitably and in line with statutory, contractual and professional requirements.

- Where possible, verbal concerns will be resolved promptly and, where appropriate, within 24 hours. If a concern cannot be resolved to the complainant's satisfaction, it will be managed through the formal complaints process.
- Formal complaints will be acknowledged within 3 working days. Where helpful, the complainant will be offered the opportunity to discuss the complaint, the complaints process and the expected timescale for response.
- The complainant will be kept informed if a response is delayed, including the reason for the delay and the revised expected timescale where possible.
- Staff involved in receiving, recording, escalating, investigating or responding to complaints will have functional knowledge of the complaints process and will apply it fairly, consistently and equitably.
- Consider the quality of care provided by reflecting on the patient's perspective and assessing whether the service meets reasonable patient expectations.

- Review services and how they are delivered in response to complaints, suggestions, compliments and feedback received.
- Make changes where necessary or appropriate to improve services, support learning and enhance the patient experience.
- Share feedback and changes made with patients, stakeholders, commissioners and local health networks where applicable.
- Keep accurate records and documentation for all complaints and feedback.

Data Protection Complaints

Lister House Surgery recognises that individuals have the right to raise concerns about how their personal information has been collected, used, stored, shared or otherwise processed.

Complaints relating to data protection, confidentiality, privacy, information sharing, subject access requests, consent, data accuracy, information security incidents or any other matter relating to personal information will be managed through this Complaints, Suggestions and Compliments Policy and Procedure.

All data protection complaints will be:

- Recorded and acknowledged in line with this procedure.
- Investigated by an appropriately authorised manager, Data Protection Lead or nominated representative.
- Managed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- Responded to within agreed organisational timescales.
- Retained as part of the governance and compliance records at Lister House Surgery.

Where a complainant remains dissatisfied following the completion of the complaints process at Lister House Surgery, they will be informed of their right to raise concerns with the Information Commissioner's Office (ICO).

Compliments, Suggestions and Feedback

Lister House Surgery welcomes compliments, suggestions and feedback from patients, carers, representatives, visitors, staff and external partners. Feedback helps us understand what we are doing well and where we can improve.

In line with April 2015 contractual requirements, Lister House Surgery maintains the Patient Participation Group (PPG) to:

- Highlight strengths and good practice.
- Identify areas for improvement and implement changes.
- Show value for patients' feedback by acting on it.

Compliments will be recognised and celebrated. Compliments, suggestions and feedback will be reviewed regularly and used to celebrate good practice, identify themes, inform learning and support continuous improvement across Lister House Surgery.

Lister House Surgery will explore and identify themes from all compliments, complaints and other feedback received for the purpose of quality improvement planning. Where changes, developments or improvements are made following feedback, these will be shared through the communication channels at Lister House Surgery with patients, staff and stakeholders where appropriate, while maintaining confidentiality.

For NHS services, Lister House Surgery submits annual KO41b complaints data to NHS Digital.

Procedure

5.1 Summary of the NHS Complaints Process

1. When a complaint is received, staff should listen carefully, remain professional and, where possible, try to resolve the concern promptly if it is within their role and authority to do so.
2. Staff should explain the complaints process clearly and provide the patient-facing complaint procedure where appropriate.
3. All complaints must be reported to the lead or nominated manager so they can be logged, assessed and managed appropriately.
4. If a complaint can be resolved to the complainant's satisfaction within 24 hours, it is not necessary to go through the formal complaints process.
5. If it cannot be resolved to the complainant's satisfaction within 24 hours, the complaint will be recorded as a formal complaint. If the complainant is not the patient, consent to investigate and resolve the complaint must be obtained from the patient.
6. Formal complaints will be acknowledged in writing within 3 working days. The acknowledgement will confirm the main concerns raised, explain that the matter will be investigated and provide details of the expected response timescale.
7. Where possible and appropriate, a discussion will take place with the complainant to understand their expectations and preferred outcome(s) and aim to manage their concerns to their preferred outcome(s), depending on the nature of the complaint. An action plan and timescale will be agreed, along with the complainant's preferred method of communication.
8. The complaint will then be investigated, after which the complainant will receive a reply and response as agreed in the plan, and a meeting will be offered if necessary and appropriate. Where applicable, the reply will include information regarding the complainant's right to escalate data protection concerns to the Information Commissioner's Office (ICO).
9. Should the complainant be dissatisfied with the response, further discussion and efforts must be made to resolve the complaint, including local mediation and arbitration where appropriate, for example, via Patient Advice and Liaison Service (PALS). Where all attempts to resolve the complaint locally have been unsuccessful, details of the ICB complaints team and Parliamentary and Health Service Ombudsman (PHSO) will be shared with the complainant.

Where the complaint relates to the processing of personal information, confidentiality or data protection matters, the response will also advise the complainant of their right to contact the Information Commissioner's Office (ICO) if they remain dissatisfied following completion of the complaints process at Lister House Surgery.

Patients can also contact their local Integrated Care Board (ICB) for complaints about primary care services, including GPs, dentists, opticians or pharmacists, and secondary care services, such as hospital care, mental health services, out-of-hours services, NHS 111 and community services like district nursing. Each ICB will have its own complaints procedure, which is often displayed on its website.

5.2 Receiving a Complaint

A complaint may be received verbally, in writing or electronically. A complaint may be made by a patient, by someone affected by the issue, or by someone acting on behalf of a patient where appropriate authority or consent is in place.

This may include someone acting on behalf of a patient with the patient's written consent, such as a relative, advocate or Member of Parliament. It may also include someone acting on behalf of a patient who is unable to represent their own interests, provided this does not conflict with the patient's right to confidentiality or any previously expressed wishes.

Once a complaint is received, it must be managed using the appropriate complaints process. Lister House Surgery will acknowledge formal complaints in writing within three working days of the complaint being received.

The acknowledgement does not need to address the details of the complaint itself. Its purpose is to advise and reassure the complainant that the matter has been received and will be investigated.

Lister House Surgery will establish a practical plan and direction for the investigation at an early stage. This supports a fair, proportionate and timely process for everyone involved.

5.3 Investigating Complaints

Before an investigation begins, Lister House Surgery will assess the seriousness of the complaint to inform you what action should be taken next. Where a complainant does not wish to pursue an issue, Lister House Surgery may still review or investigate the matter raised in the usual way where appropriate and will decide whether to feed back any findings to the complainant on an informal basis.

The complainant may be offered the opportunity to meet with Lister House Surgery in person, online or by telephone, to discuss the complaint, clarify their concerns and understand their expectations for the outcome, where this is appropriate and helpful.

Complaints can be made by patients or by someone who is affected, or likely to be affected, by the action, omission or decision of the responsible body that is the subject of the complaint.

For complaints made on behalf of a child, Lister House Surgery must be satisfied that the complaint is justified and is being made in the child's best interests. If the practice is not satisfied that this is the case, the complainant will be notified in writing.

There is a single complaints procedure for all health and social care services. Where a complaint involves more than one organisation, the organisation with the largest element of the complaint will usually act as the lead agency responsible for coordinating the investigation and response. Where more than one organisation is involved, Lister House Surgery will support appropriate liaison and signposting to help ensure the complaint is managed clearly and proportionately. Further information is available from the Parliamentary and Health Service Ombudsman.

Lister House Surgery will support staff throughout the complaints process, including where advice, guidance, supervision or wellbeing support may be required.

5.4 Anonymous Complaints

Anonymous complaints received online via the website or social media will be investigated in the same way as a named complaint where sufficient information is available. They will be logged, any necessary corrective action will be taken and recorded, and, where appropriate, a response may be displayed anonymously in reply to the complaint. The complainant may be asked to contact Lister House Surgery so that the complaint can be fully investigated and resolved.

5.5 Vexatious Complaints

Lister House Surgery may occasionally receive complaints that, due to their nature, frequency or repetition, disrupt work, incur disproportionate costs or affect staff wellbeing. These complaints will be considered carefully and managed fairly, consistently and proportionately.

Lister House Surgery will comply with the Equality Act 2010 and will make reasonable adjustments where appropriate. Where a disability or communication need may affect how a patient or complainant communicates, the practice will consider their individual needs before making any decisions about how the complaint should be managed.

A complaint may be considered vexatious, but the individual making the complaint will not be labelled as vexatious. Even where a complaint is considered vexatious, formal complaints will still be accepted, recorded and reviewed in line with the practice's standard complaints procedure.

To determine whether a complaint may be considered vexatious, Lister House Surgery will review the history, context and nature of the complaint, including whether:

- The complaint appears intended to disturb, disrupt or pressurise Lister House Surgery or its staff.
- The manner in which the complaint is pursued causes disturbance, disruption or pressure.
- The complaint is clearly unreasonable.

If a staff member believes a complaint may be vexatious, it must be referred to Dr Mahya Johnson and Dr Iram Afshan with a summary of the reasons for this concern.

Dr Mahya Johnson and Dr Iram Afshan will review the complaint, seek external advice where appropriate, and determine whether the complaint should be declared vexatious. Where a complaint is not deemed to be vexatious, it will be returned to the appropriate point in the complaints handling process.

If a complaint is deemed to be vexatious, Dr Mahya Johnson and Dr Iram Afshan will respond directly to the complainant explaining why this decision has been made and advising that the complaint will be closed with no further action. They will also consider whether the making of a vexatious complaint requires a restriction on communication following unreasonable behaviour.

Any declaration will refer only to the specific complaint being considered vexatious. Any further complaints from the same individual will still be considered on their own merits.

If an individual wishes to challenge a decision made in relation to this policy, and all attempts to resolve the complaint locally have been unsuccessful, details of the ICB complaints team and the Parliamentary and Health Service Ombudsman (PHSO) will be shared with the complainant.

5.6 Lister House Surgery Complaints Register

The complaints register will contain all correspondence from each complaint received, including the following:

- Details of the complaint, including subject matter, date of receipt and method of receipt.
- Date and method of acknowledgement.

- Notes from any meetings with the complainant wherever possible agreed with the complainant by countersignature.
- Details of any reason for delay where investigations take longer than any agreed response period, including evidence that the complainant has been kept informed of any delay.
- The date the response letter was sent to the complainant.
- Dates when the complaint was discussed in Lister House Surgery internal meetings.
- Changes or developments were made in response to the complaint because of the investigation, including how and when these were shared.
- Learning from complaints to improve quality of care.
- Dates of formal complaints reviews.

Where complaints are raised by telephone, the log will include the date and time of the call and the content of the conversation.

Complaints shared for learning purposes will be anonymised by removing all identifiable patient information and any details that could identify the complainant.

A complaints register, which will also assist completion of the KO41b Primary Care (GP and Dental) Complaints Collection, is available in QCS resources.

5.7 PALS and Healthwatch

Patient Advice and Liaison Service (PALS) is available to help and support patients if they are unhappy about any health-related matters but do not want to lodge a complaint. Patients can be put in touch with PALS or may contact PALS independently to ask for help.

The main aims of PALS are to:

- Help resolve problems when they arise by working with the staff concerned to negotiate a mutually agreed solution.
- Provide information about local health services.

Local Healthwatch was introduced by the Health and Social Care Act 2012 with the aim of building on the existing functions of Local Involvement Networks (LINKs), including the provision of information and advice to help people make choices about health and care services and, where available, advocacy support for people making a complaint using local complaints processes.

5.8 Parliamentary and Health Service Ombudsman (PHSO)

The Parliamentary and Health Service Ombudsman (PHSO) is the final stage for unresolved complaints. The PHSO usually expects complainants to raise their complaint with the organisation they are unhappy with first and is only likely to become involved if the initial approach proves unsuccessful. The PHSO does not investigate every complaint it receives and has legal criteria that must be satisfied before a complaint can be taken forward.

If the PHSO proceeds, it will check whether the local complaints process has been completed. Public organisations are given the opportunity to put things right before the PHSO will consider the matter. If the organisation has not had that opportunity, the investigation is usually declined at that point, and the complainant may be asked to make full use of the complaints process at Lister House Surgery. The PHSO will consider:

- Whether the complainant has been personally affected by what happened.
- Whether the complainant contacted the PHSO, or an MP, within a year of knowing about the issue.
- Whether the complainant has, or had, the option of taking legal action instead.

- Whether Lister House Surgery may have got things wrong in a way that has had a negative effect on the complainant and has not been put right.

If these preliminary checks are satisfied, a formal investigation may follow. The PHSO may contact Lister House Surgery, Dr Mahya Johnson or Dr Iram Afshan to try to resolve the issue or may carry out an investigation and look in detail at the event or occurrence that led to the complaint. The steps taken will vary depending on the nature of the complaint and may include gathering additional evidence and information by speaking to the complainant and Lister House Surgery or obtaining expert advice.

Possible outcomes from a PHSO review or investigation may include:

- The PHSO may decide not to investigate the complaint and will explain the reasons for this decision to the complainant.
- The complaint may be resolved without a full investigation where further local action is agreed.
- The complaint may be upheld, partly upheld or not upheld.
- The PHSO may recommend actions to put matters right, such as apology, explanation, review of procedures, service improvement, staff learning or other corrective action.
- Where appropriate, the PHSO may recommend a financial remedy where the complainant has experienced injustice or hardship that has not otherwise been put right.

5.9 Timeline for Submitting a Complaint

In line with the NHS complaints procedure, complaints should normally be made within 12 months of the incident that gave rise to the complaint, or within 12 months of the complainant becoming aware of the matter. Lister House Surgery may consider a complaint outside this timescale where there are good reasons for the delay and where it remains possible to carry out a fair and effective investigation.

5.10 Complaints About Locums, Agency or Temporary Staff

Lister House Surgery will obtain agreement from locum GPs, locum nurses and other temporary clinical staff for them to participate in the complaints procedure if required, as complaints may arise after the locum, agency or temporary member of staff has moved on.

Lister House Surgery will give locums and temporary members of staff involved in the complaints process every reasonable opportunity to respond to complaints. The process will be applied consistently, with no discrepancy in how it treats locums, agency workers, temporary staff, salaried GPs, GP partners or any other permanent staff members.

5.11 Complaints Files and Records

A separate file will be kept for complaints records and correspondence on practice S: drive. Complaint records must not be stored within a patient's electronic or paper medical records, or within the records of a complainant who is not the patient but is registered with Lister House Surgery.

Any complaint resolved by Lister House Surgery through the formal complaints procedure will be kept on record for 10 years, in line with the retention period used for litigation cases.

Lister House Surgery will comply with data protection legislation and UK General Data Protection Regulation requirements in relation to complaint handling, recording, storage and archiving.

5.12 Suggestions

Suggestions can be made verbally or in writing using any of the feedback and communication channels available at Lister House Surgery, including Friends and Family Tests, Healthwatch, patient participation or other engagement groups, and direct contact with the practice.

Suggestions are usually made by patients or service users who are seeking to improve Lister House Surgery, help services meet patient needs, or respond to changes and trends.

Suggestions are not complaints. However, they will be recorded, reviewed and acted where appropriate to reduce the risk of a future complaint relating to the suggestion made.

Suggestions will be dealt with in the same way as other feedback and informal complaints and will be included in meeting reports alongside other feedback.

5.13 Compliments

Compliments are valuable because they help Lister House Surgery recognise what patients value and where good practice should be celebrated and shared. The practice will ensure that:

- Compliments are shared with relevant team members so that positive feedback is recognised and appreciated.
- Compliments are anonymised unless the patient or representative has given consent for their feedback to be shared more widely or attributed to them.
- The number of compliments received is logged in the register, alongside complaints and other feedback.

Verbal positive feedback from patients and service users will be recorded and shared. The patient or representative may be asked whether their compliment can be reproduced on a named basis with their consent, or anonymously.

Compliments, together with complaints, suggestions and other feedback, will be taken as a standing agenda item at relevant internal meetings.

5.14 Friends and Family Test (FFT)

Since December 2014, NHS GP practices in England have been required to offer patients the Friends and Family Test (FFT). The FFT is a quick feedback tool that asks patients about their experience of Lister House Surgery and allows them to provide free-text comments where they wish to do so. The FFT complements, but does not replace, the complaints procedure.

Published FFT scores for general practice and other providers are available on the NHS website.

Lister House Surgery may offer the FFT through a range of methods, such as postcards, SMS messages, the practice website, online forms, apps or kiosks, adapting the approach to suit local engagement activities and patient needs.

All patients can provide feedback through the FFT. Lister House Surgery will consider accessibility needs and reasonable adjustments to support patients with diverse communication needs, including patients living with dementia or hearing loss. The FFT is available in multiple languages where required.

Free-text comments provide real-time feedback that can help Lister House Surgery monitor themes, identify trends and improve services.

Through the Calculating Quality Reporting Service (CQRS), Lister House Surgery must submit monthly FFT data, including:

- The total number of responses received in each response category.
- The number of responses received by each collection method.

Lister House Surgery will submit FFT data as soon as possible after the month end and no later than the twelfth working day, inclusive.

5.15 Audit and Evaluation

Lister House Surgery will record, monitor, review and analyse all complaints and other feedback received about the service as part of the practice's continuous improvement cycle, to identify and inform performance, effectiveness, quality, safety and trends. Lister House Surgery will investigate or explore what has been received and act on the findings that emerge.

Lister House Surgery will:

- Share themes and trends with the practice team and relevant external stakeholders, for example commissioners, secondary care, community and primary care providers, where required by NHS England and where appropriate in the interests of developing and disseminating best practice.
- Carry out and submit complaints reviews to NHS England, commissioning bodies and statutory bodies where required.
- Review complaints, compliments and other feedback received, together with the outputs and outcomes from the management process, as a standing agenda item at practice meetings.
- Ensure staff members are trained to deal with complaints, compliments, suggestions and feedback, and understand the complaints procedure so that they can advise complainants accurately.

5.16 Annual Complaints Return – NHS Practices KO41b

Lister House Surgery will report all written complaints received through the KO41b Primary Care Data Collection. This information is made available through an annual publication on the NHS Digital website. The data collection refers to written complaints received between 1 April and 31 March each year. It is a statutory requirement to declare complaints information as detailed in the 2009 Complaints Regulations.

Lister House Surgery will refer to NHS Digital guidance notes for the GP collection. The guidance gives information about the data that must be reported, including:

- Complaints brought forward from the previous reporting period.
- New complaints received.
- Total complaints resolved.
- Number of complaints upheld, partially upheld and not upheld.
- Total complaints carried forward.
- Age, including the number of complainants in each age group.
- Complainant type, including the number of new complainants in each complainant type group, such as patient, parent or carer.
- Service area, for example GP surgery.
- Subject area, for example appointment availability, appointment length, clinical treatment errors or confidentiality breach.
- Staff group, for example administrative staff, locum practitioner or practice nurse.

The template for recording this information for submission of the annual complaints return is available in the user documents section of the KO41b Primary Care (GP and Dental) Collection webpage.

Definitions

Compliment

- Positive feedback about the care, service, support or experience received from Lister House Surgery or its staff.
- Compliments help identify good practice and recognise what patients, carers, representatives or other stakeholders value.

Complaint

- An expression of dissatisfaction about an action, omission, decision, care, treatment, service or experience provided by Lister House Surgery.
- A complaint may be made verbally, in writing or electronically by a patient, someone affected by the matter, or someone acting on behalf of a patient where appropriate consent or authority is in place.

Suggestion

- Feedback or an idea offered to help improve services, respond to patient needs, or support changes and developments at Lister House Surgery.
- A suggestion is not a complaint, but it will be recorded, reviewed and considered as part of service improvement and learning.

Written Complaint

- A complaint received in written form, including by letter, email, online form or other electronic communication.
- Written complaints will be recorded and managed in line with the formal complaints procedure and relevant reporting requirements.

Vexatious Complaint

- A complaint that, because of its nature, frequency, repetition or manner of pursuit, may be considered unreasonable, disruptive or disproportionate.
- A complaint may be considered vexatious, but the individual making the complaint will not be labelled as vexatious, and future complaints will still be considered on their own merits.

Professional Responsibilities

Professionals providing this service should be aware of the following:

- Staff members will be supported during the investigation of complaints.
- For NHS providers, Lister House Surgery will complete and submit annual complaints return through the NHS KO41b collection.
- Receiving complaints and compliments, including other feedback and suggestions, is everyone's responsibility. All members of the practice team must know how to handle any kind of feedback so that the person who complained or otherwise provided feedback understands that there is a process Lister House Surgery will follow.
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- Patients can also contact their local Integrated Care Board (ICB) for complaints about primary care services, including GPs, dentists, opticians or pharmacists, and secondary care, such as hospital care, mental health services, out-of-hours services,

NHS 111 and community services like district nursing. Each ICB will have its own complaints procedure, which is often displayed on its website.

- NHS England's complaints policy has been updated to reflect the transfer of the primary care complaints handling function to Integrated Care Boards (ICBs) and the bringing together of NHS England, NHS Digital and Health Education England. From 1 July 2023, complaints to the commissioner are made directly to the local ICB rather than NHS England.
- If a verbal complaint is resolved to the complainant's satisfaction within 24 hours, it will not be necessary to start the formal complaints process. This will often relate to an immediate or simple operational issue that can be resolved promptly.

Further Reading

Staff should refer to the most up-to-date national and local guidance when managing complaints, suggestions, compliments and other feedback. Relevant further reading may include NHS complaints guidance, the Parliamentary and Health Service Ombudsman NHS Complaint Standards, Care Quality Commission guidance on complaints management, Integrated Care Board complaints information, Information Commissioner's Office guidance for data protection concerns, Healthwatch information and any current Lister House Surgery policies, procedures, templates or local governance documents that support safe, fair and consistent complaints handling.

Good Complaint Handling

<https://www.ombudsman.org.uk/about-us/our-principles/principles-good-complaint-handling>

Care Quality Commission (CQC) - Regulation 16: Receiving and Acting on Complaints

<https://www.cqc.org.uk/guidance-providers/regulations-enforcement/regulation-16-receiving-acting-complaints>

NHS Digital - KO41b Primary Care (GP and Dental) Complaints Collection:

<https://digital.nhs.uk/data-and-information/data-collections-and-data-sets/data-collections/primary-care-gp-and-dental-complaints-collection-ko41b>

NHS - Guidance on Implementing the Friends and Family Test:

<https://www.england.nhs.uk/fft/fft-guidance/>

NHS - Friends and Family Test Frequently Asked Questions:

<https://www.england.nhs.uk/fft/friends-and-family-test-development-project-2018-19/faqs/>

The Patients Association - Improving Complaints:

<https://www.patients-association.org.uk/complaints-management>

NHS - Find your local integrated care board (ICB):

<https://www.nhs.uk/nhs-services/find-your-local-integrated-care-board/>

Other Policies and Resources

- Duty of Candour Policy and Procedure
- Advocacy Policy and Procedure
- Significant Event Policy and Procedure
- Safeguarding Adults Policy and Procedure
- Safeguarding Children and Child Protection Policy and Procedure
- Complaints Register

Annexes and Forms

The following annexes, forms and templates may be used to support the effective, consistent and auditable management of complaints, suggestions, compliments and other feedback at Lister House Surgery:

- Complaint acknowledgement letter template.
- Consent form for complaints made on behalf of a patient.
- Compliments, suggestions and feedback log.
- Learning outcome and action plan template.
- Annual complaints report template.

Annex 1: Complaint Acknowledgement Letter Template

Private & Confidential

Dear [Patient/Complainant Name],

Thank you for taking the time to submit your complaint via our online form/letter/email [delete as appropriate]. I acknowledge receipt of the complaint received by the practice on [insert date]. I am sorry that you have had cause to complain.

From reading your complaint, I understand the main concerns you have raised are: [insert summary of concerns]. Please let me know if there is anything else you wish to add to the investigation.

If you require assistance, you may contact Disability Direct, The Richard Shaw Centre, 20 Royal Scot Road, Pride Park, Derby DE24 8AJ. Telephone: 01332 299449. Email: advocacy@disabilitydirect.com. This is a free service to support patients with making a complaint.

Practice Complaints Procedure

The practice operates a Complaints Procedure as part of the NHS system for dealing with complaints. Our complaints system meets national criteria. If you make a complaint, it is our policy to ensure that you are not discriminated against or subjected to any negative effect on your care, treatment or support.

We aim to acknowledge receipt of complaints within 3 working days, or where that is not possible, as soon as reasonably practicable. You can request the opportunity of a face-to-face meeting if you wish to discuss the complaint in further detail.

We aim to investigate the matter within 28 working days. You may receive a formal reply in writing, or you may be invited to meet with the person or people concerned to attempt to resolve the issue. Please let us know if you would like the response in a format other than writing. If the matter is likely to take longer, we will let you know and keep you informed as the investigation progresses. When the investigation is complete, a final response will be sent to you.

Where your complaint involves more than one organisation, we will liaise with that organisation so that you receive one coordinated reply. We may need your consent to do this. Where your complaint has been sent initially to an incorrect organisation, we may seek your consent to forward it to the correct organisation. We keep to strict rules of medical and personal confidentiality.

Third Party Consent

If you wish to make a complaint and are not the patient involved, we will require the written consent of the patient to confirm that they are unhappy with their treatment and that we can deal with someone else about it. We will send out a third-party consent form for the patient to complete and return to us. We must receive this before the complaint can proceed, unless the patient is incapable of providing consent due to illness or accident. In these circumstances, please provide precise details of the circumstances preventing consent.

Please note that we are unable to discuss any issue relating to someone else without their express written permission, unless the circumstances above apply. We may still need to correspond directly with the patient, or we may be able to deal directly with the third party, depending on the wording of the authority provided.

The Practice Quality Team hopes to help you resolve your problem by following our complaints process. Alternatively, you may direct your complaint to Derby and Derbyshire Integrated Care Board (DDICB), but not both. DDICB will mainly deal with more serious complaints and complaints about commissioning decisions of the DDICB itself and may direct more minor complaints back to the surgery.

If you are unsure who to complain to, you can contact the DDICB PALS team, who will signpost you to the most appropriate service.

To make a complaint to Derby and Derbyshire Integrated Care Board, please use the following details: online via the DDICB complaints webpage; by email at DDICB.complaints@nhs.net; by phone on 0800 032 32 35; or by post to The Complaints Manager, Derby and Derbyshire ICB, 1st Floor East, Cardinal Square, 10 Nottingham Road, Derby DE1 3QT.

If you are not satisfied with the way the complaint has been dealt with by the provider or commissioner, you can contact the Parliamentary and Health Service Ombudsman (PHSO), Millbank Tower, Millbank, London SW1P 4QP. Telephone: 0345 015 4033. Email: phso.enquiries@ombudsman.org.uk.

If you have any questions in the meantime, please contact the Quality Department by emailing ddicb.listerhouse.patientcare@nhs.net or calling 01332 271212.

Yours sincerely,

[Name / Job Title]

Annex 2: Complaints, Suggestions and Compliments Register

The Complaints, Suggestions and Compliments Register is maintained securely and separately from patient clinical records. It is used to record, monitor and review complaints, suggestions, compliments, outcomes, learning and actions taken.

File path: S:\Y05286\Quality 1\Quality\1. Lister House Complaints\Complaints Jan 2026 - Dec 2026

Annex 3: Patient Leaflet – Compliments, Suggestions and Complaints

We welcome your feedback

At Lister House Surgery, your views are important to us. Compliments help us recognise good practice, suggestions help us improve, and complaints help us understand when something has not gone as expected.

We aim to listen, respond fairly and use feedback to improve the care and services we provide. Making a complaint will not affect your care or treatment.

How to give a compliment or suggest to the Practice

You can tell us about something that went well, or suggest an improvement, by speaking to a member of staff, writing to us, telephoning the surgery or using any available feedback route at the practice. If the suggestion is something that Lister House Surgery needs to consider, you can send it to: Lister House Surgery, Quality and Patient Engagement Manager, 207 St Thomas Road, Derby, Derbyshire DE23 8RJ. Telephone: 01332 271212.

How to make a complaint

If you are unhappy with any aspect of your care or our service, please tell us as soon as possible. Many concerns can be resolved quickly by speaking to the team involved. If your concern cannot be resolved straight away, it will be managed through our formal complaints process.

1. Who can complain?

Anyone affected by the services Lister House Surgery provides can make a complaint. A representative can make a complaint for the affected person if they cannot make a complaint themselves, have given consent for the representative to act on their behalf, or have died.

If you are not happy about making a complaint yourself and you do not know someone who can talk or write to us on your behalf, we will be happy to help you find someone from an independent organisation to act as an advocate for you.

5. How you can make a complaint

You can complain in person, by telephone, through a member of staff, or through an advocate or representative. Where someone complains verbally, we will make a written record and provide a copy of it within 3 working days where required, either by letter or by email.

6. Anonymous complaints

We deal with anonymous complaints under the same procedure. However, if you provide contact details, we can update you on the outcome of our investigation.

7. Responsibility

Dr Mahya Johnson and Dr Iram Afshan have overall responsibility for dealing with complaints made about the service. We will provide, as far as is reasonably practical, any help you need to understand the complaints procedure, advice on where you may get that help, and information about making a complaint in a way you can understand.

8. How we handle complaints

Complaints are passed to the Quality and Patient Engagement Manager and the Quality Team for review and investigation. The person investigating the complaint will have suitable seniority and experience to deal with the issues raised. We will acknowledge the complaint within 3 working days and provide the name and contact details of the person investigating it.

We will keep you informed about the progress of the investigation. We aim to complete complaints within 28 working days unless we agree a different timescale with you. When we have finished investigating, we will write to you with details of the findings, any action we have taken, and our proposals to resolve your complaint.

9. Time limits

You should complain as soon as you can after the date on which the event occurred or came to your notice. If you complain more than 12 months later, we may not be able to investigate properly. However, we will consider whether you had a good reason for not making the complaint sooner and whether, despite the delay, it is still possible to investigate the complaint effectively and fairly.

10. Further steps

At any stage during the process, if you are not happy with the way the service is dealing with your complaint, you can contact Lister House Surgery, Dr Mahya Johnson and Dr Iram Afshan, at Lister House Surgery, 207 St Thomas Road, Derby, Derbyshire DE23 8RJ. Telephone: 01332 271212.

Once we have dealt with your complaint, if you are not happy with the outcome, you can refer your complaint to the relevant external body. The provider should have had an opportunity to respond and resolve matters before escalation.

The services of Lister House Surgery are registered with, and regulated by, the Care Quality Commission. The CQC cannot usually investigate individual complaints about providers but is happy to receive information about services at any time. You can contact the CQC at: Care Quality Commission, National Correspondence, Citygate, Gallowgate, Newcastle upon Tyne NE1 4PA. Telephone: 03000 616161. Fax: 03000 616171. Website: www.cqc.org.uk.

We can provide this policy in other languages or in other formats on request.

Annex 4: Complaints Form

THIRD PARTY CONSENT FORM

If you are complaining on behalf of a patient or your complaint or enquiry involves the medical care of a patient, you must obtain their signed consent. If they are unable to sign due to disability/incapacity, or the concern relates to someone who has died, the signed consent of their next of kin will be required.	
Full name of the Patient:	Date of Birth:
Patient's Address:	
Postcode:	
Patient's Home Telephone number:	Patient's Mobile number:
Full name of the Complainant:	Date of Birth:
Complainant's Telephone/Mobile number:	Complainant's Email address:
Please state your relationship to the patient: e.g. Mother, Son, Daughter, Partner, Advocate	
PATIENT CONSENT	
I fully consent to my Doctor releasing information to, and discussing my care and medical records with the person named above in relation to this complaint, and I wish this person to complain on my behalf. This authority is for an indefinite period / for a limited period only (<i>delete as appropriate</i>) Where a limited period applies, this authority is valid until: (insert date) Patient's signature: Please print name:	
COMPLAINANT CONSENT	
Complainant signature: Please print name: Date:	

Please post your completed third-party consent form to:

The Quality Department, Lister House Surgery, 207 St Thomas Road, Derby, Derbyshire, DE23 8RJ, or hand in at reception.

Outstanding Practice

To demonstrate outstanding practice in this policy area, Lister House Surgery may provide evidence that:

- For NHS practices, there is evidence of annual practice-to-practice peer review as a means of demonstrating commitment to transparency and quality.
- An annual report is prepared and published detailing the number of complaints, compliments and suggestions received, and the actions taken as a result, with learning shared more widely than with NHS England alone.
- Patients are consulted on the complaint handling process and can contribute to the future design and development of internal procedures.
- There is a strong culture throughout the practice team focused on resolving complaints within 24 hours wherever possible, to respond promptly to patient dissatisfaction and avoid complaints taking up time that could be used more productively and proactively.
- Complaints are recorded in the practice complaints register and processed in accordance with the complaints procedure, whether dealt with formally or informally.
- There is always a designated member of staff available to receive and deal with complaints, or to respond to patients providing feedback of any sort, to avoid dissatisfaction or frustration arising from patients being left to wait unattended.
- All complaints are logged, investigated and responded to within agreed timescales. Where delays occur, these are explained and the complainant is kept updated about amended timescales for the final response.
- Trends in complaints are identified and converted into developments to improve service delivery, with themes reported to commissioners and other providers as appropriate while keeping the patient at the centre.
- Wide understanding of the policy is supported through proactive use of the BrightHR.
- Locums and temporary staff formally agree to participate in complaints investigations that may be required after they have left Lister House Surgery.
- Complaints and all other feedback appear as regular agenda items at relevant Clinical and Governance meetings, with learning and proposed developments identified, shared, implemented and reviewed as part of the practice quality improvement cycle.

Closing Statement

Lister House Surgery is committed to ensuring that all complaints, suggestions, compliments and feedback are welcomed, listened to and managed in a fair, compassionate, confidential and timely way. The practice will use feedback to support openness, learning, accountability and continuous improvement, with the aim of improving patient experience, strengthening service quality and maintaining trust with patients, carers, staff and partner organisations.