

Complaints Policy & Procedure

Version	Notes	Policy Owner	Review Date
1. October 2017	Education Policy Signed off by CEO and Chair	Education Lead	October 2018
2. October 2018	New branding, Company-wide policy	BDOM	October 2019

1. Introduction

The National Centre for Integrative Medicine (NCIM) values all of our stakeholders and aims to provide excellent services for patient and service users as well as for students participating in our academic training programmes.

If anyone who interacts with NCIM is unhappy with the level of care, service or training they receive they can provide informal feedback or make a formal complaint depending on the nature and severity of the complaint.

This document outlines NCIM's commitment to dealing with complaints about the services provided by our organisation. It also provides information about how we manage, respond to and learn from complaints made about our services so we can put them right.

Most complaints can be dealt with immediately by a member of staff in a way that is satisfactory to the complainant, or escalated to the most appropriate person.

Personal Safety

We take patient and service user safety very seriously. If anyone feels that they have been abused verbally or physically during an appointment, we ask that they inform the enquiries team or clinic manager at the venue who will take them to a safe place immediately. This will then be reported to NCIM enquiries and actions taken in line with the NCIM Safeguarding Policy.

2. Purpose and Scope

This policy covers any complaints that patients and service users, learners, staff, or other stakeholders may wish to make in relation to the activities of NCIM.

NCIM aims to ensure, as far as possible, that there is a mechanism through which patients can raise issues of concern and/or complain and that all complaints receive a thorough investigation and a full, honest and fair reply within the time frame agreed and action taken where appropriate.

NCIM also aims to ensure that all complainants are provided with a clear plan of how and when their issues are to be responded to, that all replies are based on an empathetic approach to the complainant's situation and that the replies provided offer a satisfactory explanation and conclusion to all the points raised.

NB in relation to health and wellbeing care services this includes:

- Care or treatment received in the last 12 months
- Clinic venue where treatment or care is received
- Any staff member involved in care, such one of the medical or associate therapy team or the enquiries team

NB in relation to education services:

This policy does not cover appeals in relation to academic decisions made by NCIM; these areas are covered by our Appeals Policy. If the complainant is unhappy about the way a learning assessment was delivered and conducted and they suspect malpractice or maladministration may have occurred, the complainant should send their concern to us in accordance with the arrangements in our Malpractice and Maladministration Policy.

3. Roles and Responsibilities

NCIM Board of Directors:

- Reviews monthly information about, and action plans for, serious complaints (e.g. those about safeguarding or deemed to be gross misconduct by staff) via the Chief Executive or Business Development and Operations Manager.

Chief Executive:

- Overall accountability for managing complaints from patients and service users and will sign or designate the signing of responses to all complaints investigated through a formal investigation process.
- Will be responsible for determining any necessary action in the case of 'persistent or vexatious' complaints
- Ensures that NCIM is receptive to comments and suggestions, whether they are critical or positive.
- Is the executive lead for complaints and the person designated by the Board with the responsibility of ensuring compliance with the complaints regulations and that action is taken in light of the outcome of an investigation.
- Ensures that action plans arising from complaints are implemented and monitored.

Academic Lead (or appointed deputy):

- Responsible for ensuring the investigation is carried out on complaints from students regarding our education programmes in a prompt and effective manner and in accordance with the procedures in this policy.
- Investigate the matter or allocate a relevant member of staff to lead the investigation and establish whether or not an issue relating to the complaint has occurred.

4. Making a Complaint

When making a complaint, NCIM asks that the following information is supplied:

- full name
- contact details including a daytime telephone number
- a full description of the complaint (including the subject matter and dates and times if known)
- any names of the NCIM staff or associates who have interacted with the complainant so far
- copies of any papers or letters to do with the complaint

This information is collated in the NCIM Complaints Log

Sometimes a complainant will wish to remain anonymous. However, it is always preferable to reveal their identity and contact details to us, if they are concerned about possible adverse consequences they can inform us that they do not wish for us to divulge their identity.

While we are prepared to investigate issues which are reported to us anonymously we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those to whom the complaint/allegation relates.

All complaints are handled confidentially and respectfully by the NCIM team, and where appropriate escalated to senior management. The complaint will be thoroughly investigated and logged, complainants will receive written and/or verbal communications from NCIM outlining the investigation and the outcome, along with any agreement made between themselves and NCIM.

5. Review arrangements

NCIM will review this document annually as part of our self-evaluation arrangements. We will also revise this policy as and when necessary in response to customer, learner or regulatory feedback (such as to align with any complaints process established by the regulators) and any trends that may emerge in the subject matter of complaints received.

Complaints Procedure

PART A - Patients, service users, other stakeholders

Procedure for making a complaint

In the first instance, complainants can contact NCIM with their complaint in the following ways:

- Call the enquiries team on 0117 370 1875;
- Email enquiries@ncim.org.uk; or
- Write to NCIM:

National Centre for Integrative Medicine
Rodney House (Office 11)
Clifton Down Road
Clifton
Bristol BS8 4AL

All complaints requiring investigation through a formal investigation process should be forwarded to the CEO.

If the complaint is about the enquiries team, please email the education administrator on education@ncim.org.uk – the complaint will then be escalated to the management team for a response.

Former NHS Service Users can also contact the Patient Advice and Liaison Service (PALS) or write to the local Clinical Commissioning Group (CCG).

Responding to Complaints

Complaints will be acknowledged and a timescale for responding provided within three working days of receipt of written complaints (by letter or email), or within two working days of receipt of verbal complaints.

Any member of staff dealing with a complaint through either the informal or formal complaints resolution process is required to agree with the complainant (verbally or in writing):

- The person responsible for managing the complaint and who will provide feedback.
- The method of feedback – i.e. telephone, verbal, letter, meeting.
- The timescale for response, appropriate and proportionate to the complaint being made – if a renegotiation of the original timescale is required, this must be done in conjunction with the complainant.

PART B - NCIM Students / learners on Education Programmes

Students are encouraged to raise concerns at an early stage with an appropriate member of staff at NCIM.

If the Module Lead or personal tutor cannot help, students are advised to speak to the Academic Director.

If resolution is not reached through these methods, students can:

- Call the education team on 0117 973 8035
- Email education@ncim.org.uk
- Write to NCIM:

National Centre for Integrative Medicine
Rodney House (Office 11)
Clifton Down Road
Clifton
Bristol BS8 4AL

Complaints brought to our attention by the regulators

Where the regulators notify us about failures that have been discovered in the assessment process or other activities of another awarding organization. These will be reviewed in the same manner as other external complaints. The review will be in accordance with the procedures below to ascertain if the same issue could affect NCIM qualifications.

NCIM will acknowledge receipt of a complaint within two working days, letting the complainant know who is investigating the complaint.

The Academic Director or appointed deputy will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy. They will either investigate the matter or allocate a relevant member of staff to lead the investigation and establish whether or not an issue relating to the complaint has occurred.

At all times we will ensure that NCIM personnel assigned to the investigation have the appropriate level of training and competence and that they have had no previous involvement or personal interest in the matter – other than initial contact acknowledging the complaint and explaining our procedures to the- complainant.

If the Academic Director or appointed deputy has had previous involvement in the complaint matter they will not be responsible for allocating a member of staff to carry out the investigation or for overseeing and managing the investigation.

We aim to investigate the complaint within 10 working days. If the complaint is more complex, or involves people who are not available at the time, we may need to extend this. We may contact the complainant within this period to seek further information or clarification (in

some instances we may recommend a meeting). At the end of the investigation we shall write/email to inform them of our decision.

Successful complaints and/or issues brought to our attention by Ofqual

If any part of the complaint is upheld, NCIM will of course respond accordingly and give due consideration to how we can improve our service and arrangements.

Examples of the kind of arrangements we may implement as a result of an upheld complaint may include:

- Undertaking appropriate staff induction or training as required to prevent the complaint matter from reoccurring
- Considering if the complaint indicates a future risk that may need to be added to our risk logs
- Reviewing our procedures to assess the impact on our qualification development, delivery or awarding arrangements and assessment process

In extreme circumstances, internal disciplinary procedures may be exercised where the performance or behavior of our staff is deemed inappropriate.

In situations where a complaint has been successful, or where an investigation following notification from the regulators indicates a failure in our processes, we will give due consideration to the outcome and will take appropriate actions such as:

- identifying any other learner and/or NCIM who has been affected by that failure
- correcting, or where it cannot be corrected, mitigating as far as- possible the effect of the failure
- reviewing and amending our arrangements, where appropriate, to reduce the likelihood that the failure will reoccur in the future

If Students are not happy with the reply

If a student disagrees with the decision, they will be advised to refer the matter to the Academic Director who will liaise with NCIM's Awarding Body, The Crossfields Institute, in an attempt to resolve the matter.

If complainants are still unhappy with the decision taken by NCIM in reviewing the complaint they can, where relevant, take the matter through our Appeal arrangements which are outlined in our Appeals Policy.

If after they have exhausted our Appeals arrangements and are still unsatisfied with the outcome, students can complain/appeal directly to the relevant regulatory authority for the qualification (e.g. Ofqual in England). Please note that an appeal is not the same as a complaint, please see our Appeals Policy to see if you think this might be an appeal.