
Minutes
Complaints Managers Governance and Learning Forum
10:00am-12:00pm Monday, 28th November 2022 via WebEx

1. Welcome: The Assistant National Director, NCGLT, Patient and Service User Experience, opened the meeting by welcoming everyone present to the final forum meeting of 2022. The high attendance for this years forum was acknowledged and members thanked for their commitment.

New group members were formally welcomed and introduced.

2. Minutes from last meeting

Minutes were agreed.

Matters arising:

- (a) The updated Complaints Officer and Review Officer letter template packs as well as a new template letter pack for Accountable Officers was circulated to forum members in October for onward circulation to Complaints Officers / Review Officers. The letter packs are now also available to view on the website and can be downloaded from there.

All forum members whose area (CHO / Hospital Group / National Service) have their own content published relating to how to contact the Office of the Ombudsman have confirmed that they have amended their website information to reflect new guidance in relation to how the Ombudsman wishes his contact information to be displayed. The Ombudsman was contacted to confirm that all the website information as confirmed to NCGLT was updated and that the HSE were now fully compliant with his request.

A group member highlighted an issue that an older version of the template letters appears when a google search is used to access the template letters. It was advised that all pages sitting under the new site were displaying the up to date template letters, however, this may be an issue with information that did not get copied over during the website migration. It was also recommended that if the up to date templates are not displaying that the cache settings are cleared to ensure the older documents are not resurfacing from previous searches.

Action: NCGLT will review.

Action: NCGLT will circulate reminder to clear cache settings if old template versions are being returned on a search.

- (b) Nursing Home Survey Update: National Older Persons provided an update in relation to the Resident Experience Survey which incorporated both feedback from Residents and from their designated representative or family member. National Older Persons confirmed that the report was launched by HIQA on the 1st November 2022. The HSE response is expected to issue in Q1 2023. It was confirmed the outcome was positive and the key learning for this forum is to ensure that information surrounding how to make a complaint is available in residential units for older persons as the response from the survey suggests that those who did make a complaint were very satisfied with how the process worked.

Action: Link in with National Older Persons prior to next forum.

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- (c) Advice from DPO regarding consent was circulated following the previous forum.
- (d) The deadline for the submission of cases for the Q3 edition of the Casebook was extended by 1 week to allow for all areas to submit a casebook. For the final edition for 2022 members to support and encourage Complaints Officers/ Review Officers to complete their Learning Notification Forms following their investigations / internal reviews and to submit to Complaints Managers. The response to the casebooks has been very positive and the most recent casebook was circulated to Service User engagement groups who were very welcoming and encouraged by it.

3. Complaints Management within Children's Health Ireland: Patient Feedback and Support Service Lead

An update was provided in relation to the Children's Health Ireland Patient Feedback and Support Service. Their department encompasses complaints management, compliments and patient feedback as well as patient experience and patient engagement.

CHI Hospital Group are in a process of change and amalgamation moving towards the new children's hospital meaning they are in a process of trying to streamline all their processes across CHI and patient feedback is one of the important areas for streamlining.

Since the introduction of Children's Health Ireland, the Patient Feedback and Support department have recently introduced a new patient feedback form where the focus is on online feedback. They have liaised with all their different hospital sites senior management, family forum, patient advisory council with regard to feedback and also introduced a poster and a simple patient feedback form to allow for people to give feedback in real time. Since the introduction of the poster there has been a 400% increase in compliments and a 200% increase in complaints.

The the new Partnering with Patients Coordinator was introduced to the Group.

Other new initiatives were introduced such as the Family Advisory Council.

4. Update on CMS: NCGLT

An update on CMS was presented along with a summary of available Q3 CMS data returns.

A forum member queried whether the CMS data reflected continues to be collated from two data sources i.e., CMS data and excel sheet data. It was confirmed that voluntary agencies continue to submit data via excel data sheets, however, only CMS data is being accepted from statutory services as the use of CMS is mandatory. The Assistant National Director of NCGLT confirmed that the National Director of Operational Performance and Integraton is currently exploring the mandatory use of CMS by voluntary agencies.

A forum member queried issues surrounding delays in closing out complaints due to delays in receiving responses from clinicians in relation to clinical elements of complaints. It was clarified that the CMS is not designed for clinical complaints. If logging a complaint that contains clinical elements, to log the clinical elements as an issue but to immediately close it off, meaning the complaint can be logged and closed if YSYS elements have been addressed and the clinical element is with the appropriate clinician. In terms of issuing the report, ideally the clinician would take an active role and will provide a response within the timeframe. It is important, as per policy, to give them the right of reply. We need to give them the 30 days set out in policy. If there is a consistent delay from a particular clinician it should

be brought to the attention of the clinical lead and they should be directed to the HSeLanD training module for additional support and guidance.

5. Case Study Presentation: RCSI

RCSI presented 'Learning from Compliments: Positivity during Adversity', a case surrounding a mother who took the time to provide positive feedback following the care and professional medical attention received whilst in the care of midwives during a traumatic birth experience.

RCSI highlighted the importance of disseminating compliments back to staff. The hospital in question have developed a quality improvement initiative called "Reflective Rounds" to share complaints, comments and compliments to frontline staff and to public facing staff allowing staff to reflect on same. Quarterly complaints are discussed at the staff networking forum.

NCGLT complimented the learning and follow through stemming from the positive feedback and expressed an interest in the complaints staff networking forum and suggested spreading this initiative throughout services.

6. Update on HCAT: NCGLT

Group members were updated on the HCAT project which ended in February this year. A press release was issued in July highlighting HCAT and the innovative use of complaints data. A poster was also submitted for the National Patient Safety Conference in October this year and was successful in being selected for display at the conference. The poster was a snapshot of the acute project and was well received on the day.

What has happened as a result of HCAT in different areas was discussed. Work is ongoing with a hospital site in relation to HCAT and the Quality and Patient Safety Manager presented the findings stemming from HCAT to the senior management team who were impressed with how HCAT added statistical analysis and validity to the feedback received to inform improvement. HCAT is being piloted by Patient Experience facilitators in 2 directorates and presented on what has been happening as a result of the findings.

It was advised that the hope is from next year that NCGLT will work with individual CHO's and HG's to review what is arising for them as a result of HCAT. NCGLT will link in with forum members prior to the next forum scheduled for March 2023 to discuss same.

7. Update on AON: NCGLT

A presentation was given on Assessment of Need complaints including areas of concerns highlighted by statistics and legal issues arising. AON complaints have become more challenging requiring a lot of legal advice.

8. Discussion Items:

(i) Management of GP and Dental Complaints

Challenges in relation to the management of GP and dental complaints were discussed.

While the majority of GMS GPs are engaging in YSYS, there is no legal obligation to do so. From the agreements in place it would appear that the HSE should be treating GP and dental complaints as we would complaints relating to voluntary agencies and that GPs and Dentists should have their own local complaints

procedures in place. Unless the complaint relates to a contractual issue the HSE should not get involved in the complaint directly. National guidance has been sought from Community Strategy, in relation to the issue following discussion with the National Contracts Unit. We are awaiting a response.

It was confirmed that PCRS cannot get involved in complaints surrounding relationship issues. PRS are only responsible for administering GP assignments.

Pending clarification and confirmation of position, in the interim, where the GP's are happy to try and resolve complaints under YSYS and for the benefit of the clients and service user, the HSE should continue to do so.

Action: Issue to be escalated with clarification requested by end of year.

(ii) Consent

The issue of consent was discussed, specifically in relation to Cervical Check who receive cross complaint spanning over a number of services. It was confirmed that it would need to be distinguished between internal and external elements as consent is required where third parties are involved. This would be different to usual complaints as Cervical Check complaints would require a coordinated response. Advised to review data sharing agreements in place as there may be an existing legal or contractual agreement in these cases.

Another forum member sought guidance regarding the assumed consent where third parties are confirmed. It was confirmed that there is a consent form for such instances which is included in the updated suite of template letters as we do require explicit consent where third parties are concerned. The Data Protection Officer has explicitly stated rules surrounding consent in relation to complaints.

(iii) Escalation pathways relating to receipt of feedback from individuals threatening self harm

Clarity was sought in relation to a pathway where feedback is received from a person threatening self harm. It was advised that there would need to be differentiation between a complaint versus suicidal ideation or threat where there is a belief that the person is in imminent danger.

It was confirmed that the policy in the YSYS office in relation to a person who is in acute distress is for emergency services to be contacted.

Action: Local Suicide Prevention Office details to be circulated so that services can contact these to follow up on training requirements.

8. General Update – NCGLT

- a) Deadline for Q4 casebook: **23rd December 2022.**
- b) Learning to get better – self assessment due **31st January 2023.**
- c) Publication of Complaints Officers and Review Officers – details surrounding the legislative obligation to publish were forwarded with the minutes of the last forum. All details should be up to date and publicly available by the end of the year.
- d) Your Service Your Say Policy and Guidance Update – Draft version has been circulated for feedback.

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- e) Poll update on Complaints Manager title – Only 2 responses have been received to date. We would ask forum members to respond so preference can reflect wider feedback.
 - f) Your Service Your Say contact and materials update provided. The new materials will be available to order from Health Promotion as with the previous version.
 - g) Gráinne Cunningham O'Brien has replaced Leigh Gath as the new Confidential Recipient.

9. Any other Business:

A forum member requested an update in relation to the unreasonable complainant behaviour policy. It was advised that currently there is no update in relation to same and the policy remains awaiting approval. In the meantime the vexatious complaints policy remains available where required.

Action: All Presentation Slides & materials from today's meeting will be circulated to members.

Date of Next Meeting: 6th March 2023.

Please note Forum dates and Casebook submission deadlines below for 2023:

Forum 2023 Dates			
	<ul style="list-style-type: none"> • 6th March 2023 • 29th May 2023 	<ul style="list-style-type: none"> • 25th September 2023 • 4th December 2023 	
Casebook Submission Deadlines 2023			
	<ul style="list-style-type: none"> • 28th March 2023 • 28th June 2023 	<ul style="list-style-type: none"> • 27th September 2023 • 20th December 2023 	