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Public Health Wales (7th August 2014)

Initial Response to: A Review of Concerns (Complaints) Handling in NHS Wales "Using the Gift of Complaints"

Introduction

Public Health Wales has reviewed the report written by Keith Evans following a 12 week review into the way NHS Wales handles concerns and complaints.

Public Health Wales is committed to listening carefully and responding fairly and openly to the experience of service users, complaints, incidents and claims to ensure lessons are learned and the quality of service provided are improved.

We agree with Mr Evans that complaints received should be seen as a key source of learning used to help us to improve services. Effective service user engagement and public involvement is an important aspect of the Trusts governance and accountability arrangements. As such, it helps the organisation to improve the quality and safeguard the high standards of the services provided by Public Health Wales.

Mr Evans highlights that in most instances the public do not have the choice to go elsewhere for their NHS services. However there should still be a strong commitment to improving customer service and satisfaction within the NHS. We agree this needs to be understood by all staff who are working within the NHS and good training in this area is essential. Standing in the customers shoes is at the heart of being able to influence positive customer experience.

We agree with Mr Evans that the complaints mechanisms must be visible at all times and the concept of a complaints 'brand' may make access at all times more easy and needs further consideration. Keeping processes simple is an essential prerequisite for the public and staff in ensuring timeliness and quality in responding to complaints.

We support the view that the leadership at the very top of organisations defines the manner in which customers are treated. The importance that the Board attributes to this area of healthcare is pivotal, in meeting the expectations of the public and in realising the recommendations of the report itself.

This initial response seeks to outline Public Health Wales's commitment in meeting the relevant recommendations set out within the Review of Handling Concerns in the NHS Wales. The Review of Handling Concerns in the NHS Wales report has a number of important recommendations; the Public Health Wales Board will consider more fully the recommendations over subsequent weeks together with any responses from Welsh Government.

Systems and Processes

Public Health Wales has systems in place for recognising when things go wrong, investigating why problems occur and instituting changes where appropriate. However, to be more effective, and to support the delivery of the high quality services, the Putting Things Right arrangements and Service User Experience agenda have been integrated to provide assurance to the Board, Quality and Safety Committee and the public on the Trusts commitment to continually improve services via the triangulation and analysis of the complaints, incidents, claims and service user experience data and learning.

To this end the Service User Experience and Learning Panel provides a mechanism to monitor and to recommend adjustments to ensure that customer care principles, equality principles, process and systems are embedded throughout the organisation and are seen as building blocks in order to demonstrate the Trust is open and transparent. This is in accordance with the principles of 'Being Open' to enhance partnership working with the public, along with people's lived experience to develop and improve services.

Although the Trust has embedded systems and processes in place, it is recognised that more work is required in relation to our single point of access, effective communication by staff, and the simplification of our processes. We would also benefit by reviewing the time frame for dealing with concerns to improve the speed at which issues are resolved.

Work also needs to be undertaken to link concerns with mitigating risks so that they can be addressed to prevent reoccurrence.

Concerns Received in 2013/14

During 2013/14 Public Health Wales received a total of 114 concerns from our service users and these are broken down as follows:

Concerns investigated under PTR arrangements	54
Concerns investigated outside of the PTR arrangements	23
On the spot concerns	37

In addition to the above 5 serious incidents were investigated in accordance with the Putting Things Regulation. Each of these investigations were led by a Senior Manager for the service area that the incident occurred. Individuals were also offered meetings with both the relevant Division Director and the Senior Manager who lead the investigation

Both 'on the spot' and formal / written concerns can be received anywhere in the organisation and therefore may go unrecorded. The Datix web complaints module, implemented in April 2013, has seen an increased on the number of concerns reported and staff are encouraged to report all verbal (on the spot) concerns. It is however, acknowledged that further work is required with Divisions to ensure that when an 'on the spot' concern is reported it is recorded centrally via Datix and in a timely fashion. This will also enable us to identify any key themes so that we learn from them to try and prevent the 'on the spot' concern becoming a more formal complaint.

Making a Complaint

Many of our public facing services are tightly integrated with Health Boards. It can therefore sometimes be confusing and challenging for Public Health Wales service users to raise concerns with the right individual and organisation. This can result in concerns that relate primarily to services provided by Public Health Wales being sent to Health Boards.

We therefore, need to improve communications generally and specifically collaborate further with Concerns Teams within Health Boards to ensure that concerns directed appropriately and responded to in a timely fashion. This is particularly important when undertaking joint investigations to enable efficient partnership working with other organisational concerns structures.

We also need to make it easier for people to raise concerns by improving the 'single access points' content of our website, creating online concerns forms and improving our online guidance around raising concerns.

Reporting Arrangements

We continue to report on a monthly basis to the Executive Team and Quarterly to the Quality and Safety Committee. The reports include performance, including both quantitative and qualitative information, as follows

- Number of formal / written concerns received
- Number of on the spot concerns received
- Percentage of concerns acknowledged within the 2 day target timescale
- Percentage of written concerns responded to within the 30 working day target timescale
- Number of Serious Incidents (SIs) reported
- Percentage of SI investigations completed within the target timescale.

The implementation of the Datix web complaints module has assisted with the consistency of information captured to aid analysis. We do however, need to improve the sophistication of our analysis of the nature of concerns and complaints raised with us to enable the comparison and cross referencing of data between functions so that we can identify issues proactively.

In addition we also need to improve how we collate and report on positive feedback about the services we deliver as this will help with putting some of the negative feedback we receive in context.

Learning

Although it is acknowledged that learning occurs within the organisation we also recognise that we have much to do to improve our learning from concerns and information that we hold. A review of the Datix complaints module is to be undertaken to improve the way we categorise concerns and to track the improvements made and impact on the quality of the services provide.

Key Challenges

- Developing communications skills to support staff in how they listen and respond to service users to ensure that issues raised are resolved in an amicable and timely manner
- Improving the reporting of 'on the spot' concerns via Datix to ensure that they are received centrally to enable the identification of trends
- Work with Health Boards Concerns Teams to improve communications and collaboration with Concerns Teams to ensure that we are involved at an early stage

- Improve partnership working when undertaking joint investigations with other Health Boards and Trusts
- Improving our analysis of the nature of concerns and complaints raised to enable us to identify issues proactively
- Improving the categorisation of concerns, along with the tracking of improvements made and the impact of the changes on the services provided.

Conclusion

Public Health Wales is committed to improving services and one of the best ways we can do this is by hearing directly from our service users about their experiences to enable us to understand what action are required to make services better.

Public Health Wales will work constructively to take forward relevant recommendations identified with the report response, including considering what more can be done to encourage more openness and transparency with Public Health Wales Service User