



## THE BRITISH SCHOOL OF OSTEOPATHY

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# PATIENT COMPLAINTS PROCEDURE

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### **Introduction**

The British School of Osteopathy (BSO) always endeavours to make sure that you receive the highest standard of care during your time as a patient. We welcome comments about the services we offer and regret any patient having cause to make a complaint. We accept and are sorry that on occasion the service we give may not be to an individual's satisfaction. Consequently if you are unhappy with the standard of care you have received or with the way we have organised your care, we would like to hear about it and recognise that it may be important for you to make a complaint. The BSO clinical centre takes all comments, suggestions and complaints seriously; listening to what you have to say can help us improve the quality of what we do to better meet your needs and the needs of the community.

If you are unhappy about any aspect of your care, please speak to your student osteopath, the clinic tutor or the clinic reception team in the first instance. They are there to help you and will try to resolve the matter, hopefully in most cases, in an efficient and satisfactory way.

If you do not wish to complain formally but would like to make a comment or suggestion for improvement of our services, please complete a patient feedback form which you will find located on the information leaflet rack in the BSO clinical centre's reception area, or on request from the clinic receptionists. These can then be left in the comments box in the reception area, either anonymously or with your contact details if you require a response.

However, if you feel that you wish to make a formal complaint this policy is written to explain precisely how to go about this, how the process works and what to do if you are not satisfied with the outcome of your complaint.

The BSO Patient Complaints Procedure has been developed with best practice in mind. To that end it is informed by current NHS guidelines regarding handling patient complaints. Consultation has also taken place with the General Osteopathic Council who regulate the practice of osteopathy in the United Kingdom.

## **Aims**

The aim of the Patient Complaints Procedure is to listen to and discuss your concerns and to take action as appropriate.

The principles upon which this complaints procedure is based are:

- That complaints from patients will be dealt with seriously and fairly.
- That complaints will be investigated promptly.
- That all complaints will be considered on their individual merits, but in accordance with the BSO's equal opportunities policy, all complainants will be treated equally; there will be no victimisation of a complainant. Any ongoing care or provision of service will be unaffected by the instigation of a complaint.
- The process will be fair to you and to our staff and students.
- That all complaints will be dealt with in confidence unless the complainant has indicated otherwise, although as a matter of good practice all formal (and some informal) complaints will be notified to the Head of Clinical Practice.
- Strict confidentiality will be observed with information only being shared with staff who need to know.
- That the BSO's Quality Assurance and Enhancement Committee will review a summary of all complaints annually and will reflect on all comments and complaints made and where appropriate identify how to improve current practice for the benefit of staff, students and patients in the future.
- That the principles of natural justice are followed in a manner which is appropriate to the individual circumstances of the complaint. Those who investigate or adjudicate on a complaint will do so impartially and fairly, and will not act in relation to any matter in which they have, or may have, a material interest, or an actual or potential conflict of interest.

## **Definition of a complaint**

For the purposes of this policy a complaint is defined as "an expression of dissatisfaction received from a patient, carer or service user about any aspect of the BSO's services which require a response, whether it be verbally or in writing."

Such expressions of dissatisfaction may be made in a variety of ways; verbally, in person or by telephone, email or in writing.

This wide definition is designed to empower as many members of staff to resolve minor comments, concerns and problems immediately and informally.

The decision as to whether a matter is dealt with informally as a concern or as a formal complaint should rest with you, the patient/relative/carer. The decision should be based on information about options available to you provided by our staff.

Complaints should normally be made within six months of the event or six months of the date of discovering the problem, provided that it is within 12 months of the initial event. The BSO has the discretion to extend this time limit where it would be unreasonable in the circumstances of a particular case for the complainant to have made their complaint earlier. Such decisions will be made by the Head of Clinical Practice in consultation with senior colleagues when necessary. All complaints received will be heard appropriately, but it should be recognised that if a complaint is received about something that happened a long time ago it may be difficult to do anything about the incident.

## **Who can complain?**

Anyone who is receiving or has received treatment or services from the BSO clinic can complain. If a patient is unable to complain themselves, then a relative, carer or friend can complain on their behalf.

- If a complaint is raised on behalf of a relative or friend, the patient must provide written consent, unless the complainant is the parent or guardian of a child aged 16 or under.
- If a complaint is raised concerning a deceased patient, then this must be made by a suitable representative, preferably a close family member.

## **Exceptions**

There are exceptions as to who can make a complaint, whether formal or informal. For example:

- Individuals making complaints on behalf of someone else who are unable to provide written consent from the complainant.
- Individuals who are pursuing legal action against the BSO in relation to this complaint. In such a case any complaints in process will be suspended pending the completion of any legal process.
- The complaint is registered outside the recognised time frame detailed above without any mitigating circumstances.

## **How to complain: a three stage process**

### Stage One – informal complaint stage

If you have a complaint, you are encouraged to speak with the student osteopath, the clinic tutor or the BSO's clinic reception team about the matter to try and resolve it informally. If you would rather speak with a senior tutor about any matters then this can be arranged. Please ask any member of the care team to organise this.

It is expected that many complaints will be resolved amicably and quickly in this informal way. Normally, informal complaints of this sort should be acknowledged and responded to immediately if received face-to-face, or via the telephone, and between three to five working days if received via email or letter.

If an informal complaint requires the BSO to look into the matter further (i.e. it cannot be resolved immediately) then a response will be given to the complainant within two to four weeks. Typically responses in such circumstances will be responded to via letter.

It is anticipated that this informal procedure will enable many complaints to be resolved to the satisfaction of the complainant.

If the complaint cannot be satisfactorily resolved in this informal manner, or you feel that you would like to complain formally, you may make use of the next stage of the procedure.

Typically all informal complaints will be logged on the appropriate form, so that they can be audited and reviewed. This allows the clinic to act on particular issues, and identify any themes or trends that require further evaluation. Such complaint forms will be completed by the individual receiving the complaint whenever possible. Clinic tutors will be expected to complete complaint forms on behalf of students.

## Stage Two – formal complaint stage

A complaint that cannot be satisfactorily resolved informally may be submitted formally. This means that the details of the complaint are recorded on a formal complaints form. All formal complaints will require a full complaint report to be written and a summary of action form completed.

You can also obtain a patient complaint form in the following ways:

1. From the BSO's clinic reception team. Please either ask in person, or call 020 7089 5360 or email [clinicappointments@bso.ac.uk](mailto:clinicappointments@bso.ac.uk)
2. To download from the BSO's website (<http://www.bso.ac.uk/mm3pati.htm>).
3. By writing directly to:  
Phil Heeps  
Patient Complaints Officer  
The British School of Osteopathy  
275 Borough High Street  
London SE1 1JE

On the receipt of a formal complaint:

- The Patient Complaints Officer will provide a verbal or written acknowledgement of your concerns within two working days and will keep the patient up to date with any progress or developments as appropriate.
- Inform any member(s) of staff concerned that a formal complaint has been received.
- The Patient Complaints Officer will appoint an appropriate Investigating Officer to investigate the formal complaint. They will seek relevant documentation or statements from any member(s) of staff or student(s), and organise a Complaints Committee hearing.

The Complaints Committee will be made up of three members, at least one of which should be a lay member, and will be chaired by the Vice Principal (Research and Quality). The Chair or the Principal may appoint an alternative Chair for the Committee in circumstances where the Vice Principal (Research and Quality) is unavailable.

The committee will consider the evidence, and will be able to make the following recommendations:

- That the complaint is not valid, and that no further action should be taken.
- That the complaint is upheld and that appropriate action is necessary.
  - In situations where the complaint relates to student behaviour, the case may be referred under the Fitness to Practice and Professional Behaviour policy for appropriate action.
  - In situations where the complaint relates to staff behaviour, complaints may be referred to human resources for further action under the staff disciplinary policy.
- That the costs associated with treatment may be refunded.

Normally the Complaints Committee will provide a written decision to the complainant within twenty five working days of receiving the complaint. The reasons for the decision will normally be given. However, if your complaint is complex or raises a number of serious issues, it may take longer to investigate. You should be kept informed of the progress being made and of the reasons for any delays.

The outcome of any referrals will be reported to the complainant on completion of the appropriate process.

It is important to note that all clinic tutors, as registered osteopaths, are bound by the standards published from time to time by the General Osteopathic Council (GOsC). The BSO has a responsibility to inform the GOsC if any of its clinical staff fail to adhere to the code of practice. The BSO has a duty to inform the GOsC if any serious breach of these standards. Therefore it may be appropriate for the Committee to refer the complaint to the GOsC if they feel that the evidence indicates that the code has been breached.

### Stage Three – appeal process – if the complaint is not resolved to your satisfaction at Stage Two

If you are not, for any reason, satisfied with the outcome of Stage Two of the procedure, you have the right to appeal. In this instance you should take your complaint further by referring it in writing to the Principal and Chief Executive of the BSO:

Charles Hunt  
Principal and Chief Executive Officer  
British School of Osteopathy  
275 Borough High Street  
London SE1 1JE

- The complainant shall submit a statement in writing to the Principal and Chief Executive, stating clearly the reason(s) why s/he is not satisfied with the outcome of the Stage Two procedure. The Principal shall be provided with the details of the case and all relevant documentation by the Patient Complaints Officer who investigated the complaint. The Principal will review the case and may, if necessary, take further advice. It may be possible for the complaint to be resolved using the documentation already collected. The Principal may investigate further by calling for more evidence relevant to the case. A hearing may be called at which both the complainant and any other persons involved may put their views forward.
- Following this, a decision will normally be communicated to the complainant in writing within twenty working days of the submission to the Principal, although this may not be possible at certain times of the year. You should be kept informed of the progress being made and of the reasons for any delays.
- This decision on the complaint will be final.
- The Principal may propose that a complaint which has reached Stage Three of the process and is proving difficult to resolve be referred to a mediation procedure. Such a procedure would normally involve a mediator, who is not a member of staff or student of the BSO, assisting the BSO and the complainant to resolve the matter. The mediation procedures to be adopted would be agreed between the complainant and the Patient Complaints Officer dealing with the matter.

- Further to the processes outlined above, the General Osteopathic Council (GOsC), the regulator of the osteopathic profession, may be contacted. Here you should direct your concerns to the Fitness to Practise department where they will be able to advise you on an appropriate course of action. The GOsC contact details are:

General Osteopathic Council  
176 Tower Bridge Road  
London SE1 3LU

[www.osteopathy.org.uk/](http://www.osteopathy.org.uk/)

Tel: +44 (0) 20 7357 6655  
Fax: +44 (0) 20 7357 0011

The GOsC's complaints procedure can be found at:  
<http://www.osteopathy.org.uk/information/complaints/making-a-complaint/>

#### **Other useful resources:**

- **The Care Quality Commission (formerly the Healthcare Commission):**

The Care Quality Commission (CQC) is the independent regulator of health and social care in England. Their aim is to make sure better care is provided for everyone, whether that's in hospital, in care homes, in people's own homes, or elsewhere.

They regulate health and adult social care services, whether provided by the NHS, local authorities, private companies or voluntary organisations.

They can be contacted at:

CQC National Correspondence  
PO Box 1258  
Newcastle upon Tyne NE99 5AU

<http://www.cqc.org.uk/>

- Telephone: 03000 616161
- Email: [enquiries@cqc.org.uk](mailto:enquiries@cqc.org.uk)

The CQC's guide to complaints can be found at:  
<http://www.cqc.org.uk/contactus/howtoraiseaconcernorcomplaint.cfm>

## **The Patients Association**

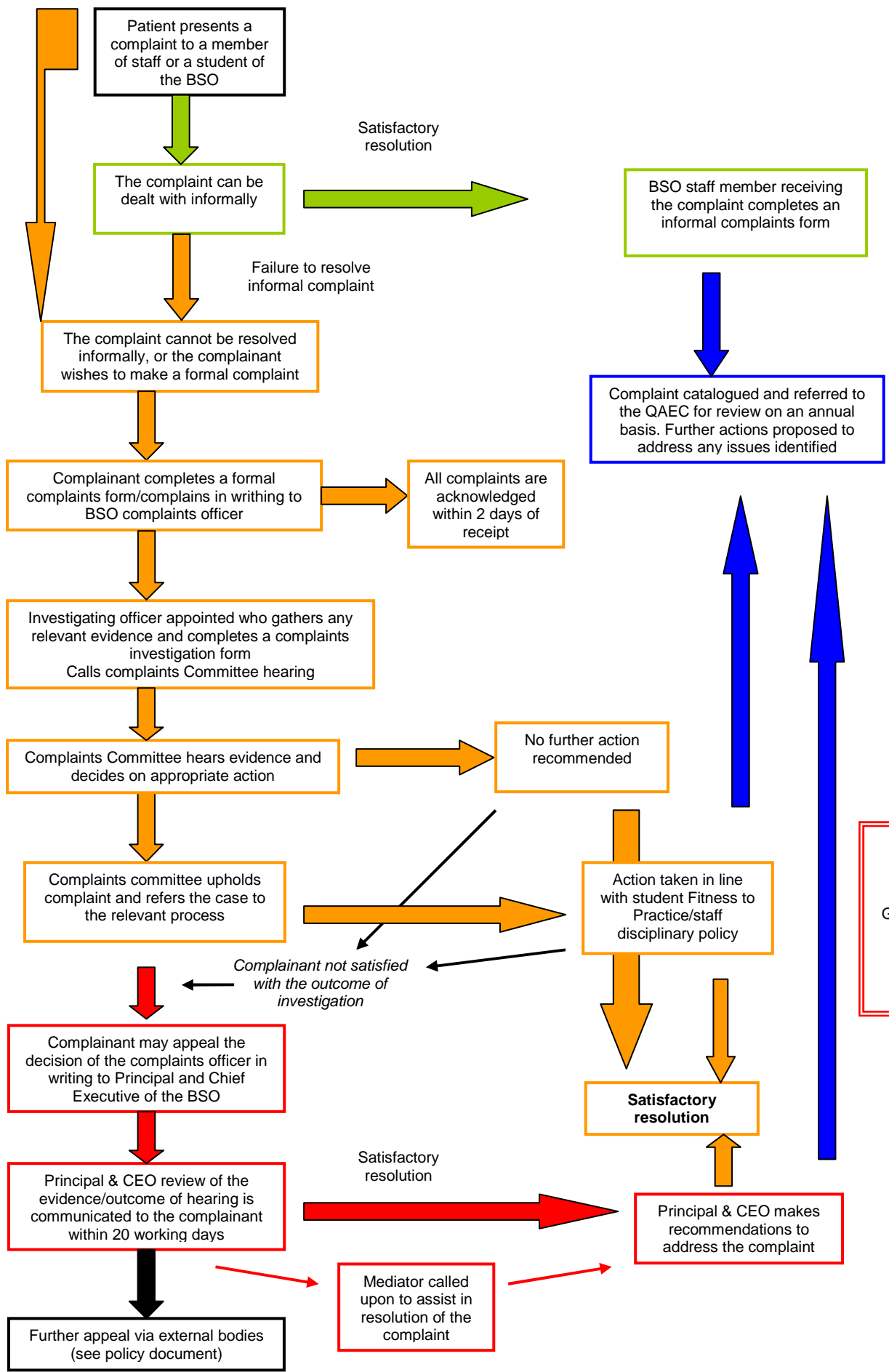
The Patients Association was set up more than 40 years ago to promote the voice of patients in healthcare. They are a registered charity committed to making a difference to the 'patient journey'.

The Patients Association  
PO Box 935  
Harrow  
Middlesex HA1 3YJ

Telephone: 020 8423 9111  
Fax: 020 8423 9119  
Website: [www.patients-association.com](http://www.patients-association.com)

The Patients Association Helpline offers you independent information and advice on a range of healthcare issues.

Telephone: 0845 608 4455  
Email: [helpline@patients-association.com](mailto:helpline@patients-association.com)



**NB:**  
At any stage a case may be referred to the GOsC Fitness to Practice Committee if deemed appropriate