

June 2018



For Practices to learn from patient experience they need to encourage feedback, in all its forms, which includes making sure people can make a complaint easily.



# One Year On Complaints Information on West Sussex GP Websites

*Revisiting the improvements in the digital accessibility of the complaints information on West Sussex General Practice (GP) websites*

# Why did we do this?

Our first [report](#) published a year ago showed many of our General Practices needed to look at the accessibility and content of their information on giving feedback and raising a concern/complaint on their websites.

We wanted to see what has changed since publishing this report.

# What we did?

In March 2018 we wrote to all Practices letting them know of our intentions to audit their website's complaints information. They received a copy of the audit template, to help them to understand what we would be looking at/and for.

Our team of skilled and trained authorised representatives undertook the audits in April 2018.

Individual Practice reports have since been compiled and quality checked to ensure fairness. The reports use a **traffic light rating system**, detail what we found, our observations and any suggestions for improvement.

Question	Findings	Can you improve this?	Rating
1. How easy is it to find information about how to make a complaint?	There is a link to the complaints page on the website, but it is not clear how to access it.	Can you improve this? The link should be more prominent and clear.	Bad
What we found	Found a link under Practice Privacy and Complaints on the second page of the page. Using the search function brought up links to the open Access, Public and Complaints page on the fourth page of the search results.		
Observations / Suggestions for improvement			

Each Practice is being sent a copy of their report at the same time as receiving this.

A full set of member reports are being provided to the Clinical Commissioning Groups, who are responsible for the quality of local health and care services.

In addition, all reports are being provided to the Care Quality Commission, who are responsible for the registration and inspection of General Practices.

Reports are also shared with Healthwatch England, so that our local work helps to better understanding the national picture of health and care.

# This is what we found

We are delighted to find that the following Practices were *green rated* in all three criteria areas:

Dolphin Practice  
 Fitzalan Medical Group  
 Grove House Surgery  
 Ifield Medical Practice  
 New Pond Row Surgery  
 Parklands Surgery  
 Ship Street Surgery  
 Silverdale Practice  
 St. Lawrence's Surgery  
 The Ball Tree Surgery  
 The Barn Surgery  
 The Coppice Medical Group  
 The Lime Tree Surgery  
 The Manor Practice  
 The Orchard Surgery  
 The Park Surgery (Littlehampton)  
 The Phoenix Surgery  
 Victoria Road Surgery  
 Westcourt Medical Centre  
 Woodlands & Clerklands Partnership  
 Worthing Medical Group

We looked at:

## 1) How easy it is to find information about how to make a complaint

Green rating was given if the information could be found either within two clicks from the homepage using site navigation by looking for the word *complain/complaint* or by typing *complain* in to the search bar.

Amber rating was given if the information could be found from the homepage but took more than two clicks, or if we needed to search under a heading which did not include the work complaint and would not be easy for a patient to find.

Red rating was given if the information could not be found.

90%

10%

0

## 2) How easy is the process to make a complaint?

Green rating was given if there was a clearly identified process (steps either on website or downloadable leaflet), and the language was easy to understand, and the tone was appropriate, e.g. welcoming people to raise concerns or offer feedback. If there were multiple options to encourage accessibility, e.g. face-to-face, phone or in writing.

Amber rating was given if the process was not clear, language was not simple, tone did not encourage people to raise concerns or offer feedback. Or there were limited options in how people could raise a concern, thereby disadvantaging people with information and communication support needs.

Red rating was given if there was limited attention to: the process, language, tone and/or accessibility.



We noted that in most cases, patients are asked to speak to the staff member involved first, to attempt to resolve the issues, before contacting the Practice Manager. This seems to make sense, provided there are alternatives for patients and that a complaints procedure is visible.

**We would encourage practices to attach PDF versions of their documents, rather than Word documents, so these are accessible to all** (including people who do not use Microsoft apps).

We would suggest that many Practices may be unaware that patients can go directly to NHS England with a complaint, as this is not stated on a lot of the websites. Therefore, patients are not being offered this as an alternative, for people who do not feel able to complain directly to a Practice. Where it is mentioned, the Practice does not state that if the person has already made a complaint to the Practice they *cannot* then go to NHS England (as this is an either, or, choice).

Silverdale Practice provides a clear explanation, which can be found on the [NHS Choices website](#).

We only found a few examples of Practices who offer information in different formats.

**3) Is the information on Independent Health Complaints Advocacy Support Service (IHCAS) easy to find and clear? (So that potential complainants can see there is support available and know how to access it.)**

Green rating was given if the correct information about IHCAS and Healthwatch West Sussex including website and telephone. Gave a description of IHCAS, making it clear that IHCAS is a complaints advocacy support service and that IHCAS does not investigate complaints.

Amber rating was given if there was limited or incorrect information about IHCAS/Healthwatch West Sussex.

Red rating was given if there was no information about IHCAS/Healthwatch West Sussex.



Some Practice information seemed to confuse the role of Healthwatch and the Independent Health Complaints Advocacy Service, in suggesting that if the patient was not happy with the service from the Practice, Healthwatch could respond to their complaint, then the patient had the right to contact IHCAS/Healthwatch who would help them to resolve their complaint. IHCAS provides independent advocacy to support people to get their voice and complaint heard.

# Observations

Several the Practices are using the same website design company and similar wording is used as a result. The danger of this approach is that any limitation in the local Practice process is replicated across many sites. This is especially so in regard to contact details, where the process information is often poor.

Using the same wording also results in omissions or errors of process being replicated across several Practices. We would suggest that this represents a lack of management commitment to the complaints process.

When searching using *complaints* the results returned in some cases, included options for 'medical complaints'. This is not helpful, as in the main medical complaints results were prioritised over those for making a service complaint.

In some cases, the download process did not work, for example clicking on the download returned either a document that was unreadable or no document was found. It is important to check through website changes carefully to avoid user-frustration and avoidable calls into the Practice.

The wording used on many websites was not supportive or encouraging the patient to make a complaint and many of the processes were not compliant with the Accessible Information Standard principles.

9 out of 10 Practices were found to meet the two-click criteria for ease of access. However, in a large number of instances the complaints policy/procedure was hidden behind other menu options. This then would require people to explore different menu options until the correct one was identified. Having a search facility can mitigate these issues. However, this could suggest a Practice is not treating the complaints process with the respect or importance it warrants.

# What next?

We would expect Practice staff to take the time to review their individual reports and where there are areas for improvement and suggestions provided, we would hope that attention is given to this.

We expect the Clinical Commissioning Groups to have the appropriate discussions with the Practices who have *Red Ratings* for questions 2 and 3 to be assured that appropriate action has happened to improve this position.

Policies and procedures, however exhaustive and detailed, are only as good as the people who implement them. Practices may wish to assure themselves that their staff are well-informed and supported so the Practice can benefit from the learning that can come from complaints and feedback. With many part-time/job-sharing roles and Locum within local Practices, senior partners may wish to explore:

- How knowledgeable are staff members about the Practice's complaints procedures?
- How good is the recording of complaints (a CQC requirement)?
- What is the evidence that Practices implement the lessons learned from the complaints process?

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