Erie St. Clair **LHIN**

Complaints Management Policy & Process

Updated 2018-19

Ontario
Local Health Integration Network

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Rationale

The Erie St. Clair LHIN Complaints Management Process provides the public with a means of registering health care complaints and concerns. The process ensures adequate follow-up, resolution, and identifies potential systemic problems. The LHIN does not facilitate complaints of an operational nature regarding any funded or non-funded provider.

The management of every complaint will be from a customer-service perspective. Complaints are also seen as opportunities for learning and evaluating our local health care system, as well as for identifying risks. The ESC LHIN is committed to the timely and effective resolution of complaints. All complaints will be acknowledged, and resolution processes will:

- Reflect the Vision and Values of the ESC LHIN
- Be transparent, accessible, and responsive
- Be managed in a timely manner; committing to timelines within our control and communicating frequently with the individual when timelines are dependent on others

The purpose of this policy is to outline the ESC LHIN's process to review complaints.

Scope

This policy applies to all ESC LHIN employees.

Policy

Complaints

ESC LHIN staff will acknowledge the complaint within two business days of receipt and will follow-up within 10 business days. ESC LHIN staff will contact the individual in the manner the complaint was received, unless otherwise requested by the individual. All individuals have the right to raise concern about health care without fear of interference, coercion, discrimination, or reprisal.

All complaints (verbal or written) received by the ESC LHIN will be entered in the issues database. The ESC LHIN issues database is stored on a secure drive, with access limited to the following:

- Director, Communications, Public Affairs, and Community Engagement
- Communications & Issues Management Specialist
- Administrative Assistant to Communications & Public Affairs

The ESC LHIN is subject to the Freedom of Information and Protection of Privacy Act (FIPPA), and in the event of a FIPPA request, personal information will be severed according to the allowable FIPPA exemptions.

Responsibilities

- The Communications & Issues Management Specialist is responsible to triage complaints, ensure a response is provided, enter all complaints received into the issues database, and to monitor and complete event resolutions in the issues database
- The Director of Communications, Public Affairs, and Community Engagement is responsible to provide consultation to the Communications & Issues Management Specialist and/or respond to complaints; to escalate high risk and/or unresolved complaints to the CEO, where appropriate; and to ensure documentation is maintained

Procedures

Complaints

All staff are expected to encourage individuals to resolve the issue with their health service provider (HSP). The majority of health care complaints are best resolved at the point of care. The ESC LHIN may be able to address system level issues and provide information for appropriate avenues of resolution. The ESC LHIN does not resolve HSP operational concerns or clinical decisions made by a health care professional.

1. Immediate action protocol when complaint is received:
    a. Receive and acknowledge the individual's complaint within two business days, as per method of delivery
    b. Notify the appropriate ESC LHIN staff and/or HSP to discuss the situation, review the issue, understand desired outcome, and determine an immediate plan of action
    c. Gather and review necessary information and consult with appropriate parties
    d. Review complaint with client/individual to determine next steps
    e. Ensure that the plan of action is communicated to the individual and all other relevant parties
    f. Document in the issues database

2. Director, Communications, Public Affairs, and Community Engagement or designate is to be informed of complaints that:
    a. Are serious in nature
    b. Involve potential litigation
    c. Involve potential investigation by a professional college
    d. Involve an ethical dilemma
    e. Potential media involvement
    f. Cannot be resolved at the Communications & Issues Management Specialist level

Method of Receipt

Please note: all responses will be initially drafted by Communications & Issues Management Specialist.

Mail

- Received by Receptionist
- All issue/complaint letters directed to Communications & Issues Management Specialist only
- Communications & Issues Management Specialist logs letter in issues database
- Communications & Issues Management Specialist stamps and distributes accordingly for action
- All action taken is reported back to Communications & Issues Management Specialist for documentation in the issues database
- Response issued to individual

Online/Email

- Complaints should be directed through the ESC LHIN website “Contact Us” section
- Email complaints are directed to Communications & Issues Management Specialist
- Any issue emails received by other staff should be forwarded on to the Communications & Issues Management Specialist
- A response will be sent acknowledging the receipt of the complaint
- Issues forwarded accordingly for action
- All action taken is reported back to Communications & Issues Management Specialist for documentation in the issues database
- Response issued to individual

Phone

- Initially received through Receptionist
- Forwarded to Communications & Issues Management Specialist, if available
- If Communications & Issues Management Specialist is not available, offer voice mail or make an appointment for a follow-up call
- Communications & Issues Management Specialist takes details of complaint. If response can be given immediately, response provided. If response not available, make an appointment for follow-up with most appropriate staff member
- Issues will be forwarded accordingly for action
- All action taken is reported back to Communications & Issues Management Specialist for documentation in the issues database
- Response issued to individual

In Person

- The Erie St. Clair LHIN cannot accept walk-in visitors due to staff schedules and availability
- In-person meetings must be made in advance
- Communications & Issues Management Specialist will always have secondary support present when meeting with an individual

Expectations of Resolution

All efforts will be made to follow-up with the individual within 10 business days, however, as the health care system operates under a multidisciplinary approach, and involves various partners, it may take longer to have information available. The LHIN will not provide any personal information to a third party organization without the written consent of the individual.

The LHIN does not facilitate complaints of an operational nature, or regarding clinical decisions, of any funded or non-funded provider.

To issue a concern about a licensed health professional, please see additional resources below.

Individual communicating to ESC LHIN staff code of conduct:

- Speak in a respectful manner
- Do not use disrespectful words
- Be proactive in finding a solution
- Cooperate with ESC LHIN staff in finding solution

If this code of conduct is not met, the ESC LHIN staff have a right to discontinue communication with the individual.

ESC LHIN staff code of conduct:

- Speak in a respectful manner
- Do not use disrespectful words
- Be proactive in finding a solution within the scope of the LHIN

If this code of conduct is not met, the individual has the right to escalate their complaint to the ESC LHIN Chief Executive Officer (CEO). If the concern is with the CEO, it will be escalated to the ESC LHIN Board Chair.

Additional Resources

- MOHLTC Long-Term Care ACTION Line: **1-866-434-0144**
- Patient Ombudsman (only hospital, LHIN home and community care, and LTC home patients): **1-888-321-0339**
- Hospital Patient Advocate: **please contact the hospital directly**
- Health Care Connect: **1-800-445-1822**
- College of Physicians and Surgeons: **1-800-268-7096**
- Ministry of Health and Long-Term Care – Service Ontario: **1-866-532-3161**
- College of Nurses of Ontario: **1-800-387-5526**
- Ontario Ombudsman: **1-800-263-1830**
- Freedom of Information and Protection of Privacy Act (FIPPA)**: 1-800-387-0073**
- Human Rights Tribunal of Ontario: **1-866-598-0322**

Appendices

Appendix 1 – Sentinel Events Protocol & After Hours On-Call Number (for HSPs)

Please note: the information below is for ESC LHIN-funded health service providers (HSPs).

Sentinel Events:

Events that are of a serious nature, and/or those that could receive media or community attention needs to be reported to LHIN through your Health System Manager (unless after hours) or the Communications Department. Once an incident has been reported, it is then our responsibility to inform the Ministry of Health and Long-Term Care of any issues that are occurring within our region. Also, by being aware of the important issues that you are working through, we can, if appropriate, be of assistance to you.

If a sentinel event or issue occurs from **8:30 a.m. – 5:00 p.m.**, during business hours, please contact your Sub-Region Director or the Communications Department. If it occurs after hours please call **519-784-0773** to reach a senior team member on-call.

Health System Manager:

Chatham-Kent: Rashoo Brar
1-888-310-8881 ext. 7326
Cell: 519-358-5956
Email: Rashoo.Brar@lhins.on.ca

Windsor/Essex: Ron Sheppard
1-888-310-8881 ext. 5342
Cell: 519-358-9572
Email: Ron.Sheppard@lhins.on.ca

Sarnia/Lambton: Jenn Mackey
1-888-310-8881 ext. 6283
Cell: 519-312-1861
Email: Jennifer.Mackey@lhins.on.ca

Communications: Shannon Sasseville
1-888-310-8881 ext. 3225
Cell: 519-784-1879
Email: Shannon.Sasseville@lhins.on.ca

Patient Confidentiality:

As a health service provider, if you are sending the ESC LHIN information in regards to an issue or a matter you would like our assistance with, please be reminded that **we cannot have personal health information or identifying information about patients without their consent.** This includes information such as name, age, address, medical history, etc. If the patient agrees to sharing information with the LHIN, consent must be obtained in writing from the patient, legal power of attorney, or substitute decision-maker. Alternatively, the patient can contact the LHIN directly with their concerns or with their permission for our involvement.

For further questions, please contact shannon.sasseville@lhins.on.ca or 519-351-5677 ext. 3225.

Appendix 2 – Health Service Provider (HSP) Compliance re: Complaints Management

The Ontario LHINs are now required to develop a process to ensure LHIN-funded health service providers (HSPs) have policies and procedures in place to address and satisfactorily resolve patient complaints. The LHINs are required to conduct annual declarations of compliance of our funded HSPs in regards to this matter; this is a requirement in all ESC LHIN-funded HSP Service Accountability Agreements.

Having a complaints process/model for patients is important; it provides the public with a means of registering their health care complaints and concerns, ensures adequate follow-up and resolution, and identifies potential systemic problems.

For further questions, please contact shannon.sasseville@lhins.on.ca or 519-351-5677 ext. 3225.

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