



Florence

Complaints Policy and Procedure (Northern Ireland)

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1. Introduction

Florence is committed to dealing with any issues that may arise as quickly and effectively as possible. Dealing with complaints in a timely manner reduces the risk of escalation and increases the possibility of finding a satisfactory resolution to the problem.

This policy describes the processes which ensure that complaints are reported accurately and promptly; properly investigated; that lessons are learned, and improvements implemented as appropriate.

Feedback is also an important means of identifying areas of good practice, and Florence will seek to ensure that feedback on good practice is shared with employees to motivate and encourage members of staff and ensure standards of care and service are improved wherever possible. .

2. Policy Statement

All complaints will be treated seriously and investigated promptly in accordance with the procedures outlined in this Policy.

All employees in the Central Team at Florence will receive training in dealing with complaints and will ensure that all persons have access to guidance on the procedures for making a complaint.

Florence recognises its legal responsibility to respond appropriately and effectively to complaints.

Our complaint policy and procedure meets the requirements of The Nursing Agencies Regulations (Northern Ireland) 2005 (Regulation 19), the HPSS Complaints Procedure and is in accordance with relevant legislation and DHSSPS guidance. Our complaint policy and procedure is also in alignment with the Representations Procedure (Children) Regulations (NI) 1996.



We will also cooperate with any complaints investigation carried out by our clients and any regulatory bodies in the geographies that we supply. Where required, a summary of all complaints, outcomes and actions taken will be made available to the RQIA and information from complaints will be used to continuously improve the quality of our services.

3. Scope

This policy and the procedures apply to all directors, managers and all employees including the central team and care professionals signed up to and working on the Florence Platform.

This policy and procedures also applies to all stakeholders of Florence, including customers, clients, suppliers, and partners. It covers all complaints related to our services, products, or conduct that are received in writing, by phone, or in person.

This policy does not cover complaints related to legal proceedings or criminal activity. Such complaints will be referred to the appropriate authorities.

This policy is open and accessible to all and as such is published to all clients and candidates (in a range of formats if required).

4. Definitions, Roles and Responsibilities

Care Professionals - employees signed up to the Florence platform who perform work for Florence in external organisations, including registered nurses and care assistants, are expected to be knowledgeable of and comply with the procedures detailed in this policy.

CEO (Chief Executive Officer) The CEO is ultimately responsible for the overall management and direction of the company. They have a crucial role in setting the tone for how to give and receive feedback and establishing a culture of customer service and satisfaction and regularly monitoring any themes or trends arising from complaints.

Central Team - All direct employees of Florence that are not care



professionals working through the Florence platform. They have the responsibility to comply with good governance standards by adhering to all policies, processes and systems by Florence. The Central Florence team is supported through the company's governance and assurance processes, including concerns/complaints management systems.

Complaint – for the purpose of this policy, a complaint is an expression of dissatisfaction, which may relate to a number of issues including: inadequate standards of care; failure to uphold the rights of a person using a service, including treatment by, or conduct of, a member of staff working with Florence or signed up to the Florence platform.

Data Protection Officer (DPO) – is the individual appointed by Florence to ensure compliance with data protection regulations and laws. The DPO serves as the primary point of contact between Florence and the regulatory authorities responsible for overseeing data protection, such as the Information Commissioner's Office (ICO). As Florence is a large organisation, it has both a DPO and a deputy DPO (DDPO) who work collaboratively

Employees – everyone employed by Florence directly and indirectly, including care professionals using the platform and the central team. Everyone has the responsibility to make sure that any complaints are logged and escalated appropriately, according to this policy, ensuring that any data is treated confidentially and in line with GDPR.

Regulation and Quality Improvement Authority (RQIA) – is the independent body responsible for monitoring and inspecting the availability and quality of health and social care services in Northern Ireland, and encouraging improvements in the quality of those services.

Client – an organisation or business that utilises Florence's services, for example, a care home, a hospital or domiciliary care provider.

Employees – everyone employed by Florence directly and indirectly, including care professionals using the platform and the central team. They have the responsibility to ensure that they are aware of the requirements of this policy and to keep any



personal data involving incidents confidential, in line with GDPR.

Governance Lead (GL) is responsible for:

- Ensuring that the complaints monitoring system is updated in a timely and accurate manner.
- Nominating the appropriate head of department/manager to investigate and respond to the complaint.
- Monitoring complaint trends and escalating identified themes/trends to the Registered Manager.

Leadership Team - comprises the most senior leaders in Florence, namely Chief Executive Officer (CEO), Chief Operating Officer (COO), Chief Revenue Officer (CRO), Chief Technology Officer (CTO), Chief Finance Officer (CTO), Chief Marketing Officer (CMO), Managing Directors and all other Heads of Department. All Leadership members have the responsibility to ensure:

- All policies, processes and systems are followed to a good standard of governance;
- To promote an open, honest and transparent culture whereby concerns can be raised and acted on as appropriate without fear of reprisal;
- Share learning within Florence

Registered Manager for Northern Ireland - is responsible for:

- Ensuring that all complaints and feedback raised within the registered service for Northern Ireland are logged and handled according to this policy, including notifying regulators where necessary.
- Supporting care professionals on the Florence platform who have been involved in complaints, in particular if the involvement of external bodies is required;

Registered Person for Northern Ireland - is responsible for:

- Oversight of the complaint management process;
- Receiving reports of complaint themes and trends from the



Registered Manager and implementing business-wide actions, where appropriate, to address these:

- Ensuring that learning from complaints is shared with the Florence team and those signed up to the Platform where appropriate.

Service User - a person who uses health and/or social care services. Sometimes known as a "patient", "person in care" or "resident of a care home".

5. Procedures

Complaints raised in relation to nurses or care assistants with the registered care service; or care professionals on the Florence platform, or members of the Florence Central team; can be directed through the customer service team at complaints@florence.co.uk.

This is to ensure clarity of the full and specific details of the complaint. Where the complainant is unable to submit a complaint in writing, they should raise the complaint with the Florence central team who will then record the complaint and advise the customer service team/Governance Lead of the details.

In regulated services, the Registered Manager should be informed of the concern at the first stage.

Comments made on internal Florence social media sites may be considered and dealt with as complaints, unless they are a part of a group of complaints of a similar pattern whereby they may be considered as whistleblowing scenarios (refer to the Raising Concerns/Whistleblowing Policy and Procedures).

All complaints are recorded on the Incident Management System (IMS); the complaint will be fully investigated and the outcome recorded. The Governance Lead will either investigate the complaint themselves or nominate the appropriate senior manager to investigate. The GL retains responsibility for updating the IMS with the outcome and responding to the complainant in writing .



Where complaints are made about the Customer Service Team or Governance Lead, they will immediately be escalated to the Florence Leadership team to appoint the appropriate person to investigate.

Response times for all complaints will be as follows:

- Acknowledgement of complaint immediately if possible, and always within 2 business days of receipt.
- Investigation will commence immediately with an assessment of the situation and contact with all individuals involved.
- We will take all reasonable and practicable steps to resolve the complaint within 4 weeks of its receipt unless the nature of the complaint requires additional investigation or action by an appropriate third party in which case the complaint will be made good or resolved as soon as possible thereafter.

The Complainant will be kept informed of any delays should it not be possible to meet the above timescales. In all cases, we will inform the Complainant of the action to be taken in response to the complaint once the investigation has concluded.

We will provide the RQIA with an annual statement containing a summary of any complaints made in the preceding 12 months and the actions taken in response to these.

Operational Complaints Procedure

Although the bulk of service issues are raised and dealt with operationally on a day-to-day basis, there may be occasions when a particular issue needs to be raised and handled formally.

We operate an open and accessible operational structure, ensuring that the leadership team is available when required to all parties. This structure allows



decisions requiring executive level input to take place quickly and efficiently, streamlining the service to our clients and candidates.

All complaints and service issues will be thoroughly investigated and documented with all parties involved. Clear and accurate communication is central to effective resolution.

All operational complaints should be made via email to complaints@florence.co.uk

Information will be requested regarding who is making the complaint together with the nature of the complaint. The person making the complaint will be asked to provide Florence with all necessary information surrounding the complaint in order for us to undertake a full investigation subject to the restrictions imposed by data protection legislation/UK GDPR. This information will be recorded in our Incident Management System

We will investigate the complaint as appropriate. Written statements will be obtained from those involved if necessary and a complaints outcome will be provided. Action to resolve the complaint will be detailed, and where appropriate, incorporated as part of our standard processes and procedures to prevent re-occurrence and improve service.

During the complaints resolution process, we will ensure that the Complainant is kept abreast of progress in making good or resolving the complaint and all communication will be recorded. On resolution, details of the complaint, the agreed resolution and actions/procedures put in place to prevent recurrence will be provided to all parties in writing.

Clinical Complaints Procedure

We are committed to ensuring the safety and wellbeing of patients and as such have a procedure which enables clients, care professionals, suppliers and company employees to raise clinical complaints in respect of:



- The behaviour, competence or performance of a care professional.
- A concern relating to a nurse's registered status, experience, background or training.
- An allegation of abuse or neglect.
- Breaches of relevant codes of conduct (including those of the NMC and client organisations).
- A specific incident that has (or could have) resulted in harm to a patient.
- A safeguarding/adult or child protection issue.
- Any other clinical concern (raised by a care professional or employee within a clinical environment).

Care professionals are advised of their obligations to report any complaint made by a service user, the client or a co-worker to us and to a senior person in the department in which they are working.

We have assigned a single point of contact for ensuring that clinical complaints are dealt with quickly and thoroughly. Clinical complaints should be made by email to the Governance team at:

Incidents@florence.co.uk

The Governance Lead will review all supporting information that we hold on the care professional e.g. details of the employment checks undertaken, their work history including any previous assignments with us and end of assignment references, details of their work performance from previous clients (if they have worked for us before), and any previous issues or concerns that have been raised about the individual.

Depending on the nature of the complaint, the care professional may be suspended pending investigation. This decision will be made in conjunction with all relevant parties.



During the complaints resolution process, we will ensure that the complainant, the customer and the care professional(s) concerned (where appropriate) are kept abreast of progress in resolving the complaint.

Action to resolve the complaint will be documented and shared with all parties. This may include reinstatement of the care professional to termination of the assignment and exclusion from future work with us. All parties will receive an emailed copy of the outcome of the complaint and details of the resolution.

If the complaint relates to malpractice, adult/child protection or an event that requires notification (i.e. where we believe that patients or staff may be at risk of harm from inadequate or unsafe clinical practice or inappropriate behaviour or there is a risk that an individual may pose a threat to patients or staff because their conduct compromises the effective function of a team or service), we will provide a written report to the RQIA, NMC and if appropriate the Police.

Refer also to the Incident Management Policy and Procedures (Northern Ireland) for further management details of how to raise and manage complaints that are also clinical incidents, including allegations of abuse/harm.

Complaints Escalation Process

Should the complainant be dissatisfied with any aspect of the handling of their complaint or the outcome they should contact the governance team directly at: incidents@florence.co.uk or alternatively,

to the Head of People Operations & Governance directly at:

caroline.hayes@florence.co.uk

The complaint will then be investigated by the appropriate member of the leadership team, who will propose a course of action. The Head of People Operations & Governance will continue to review the outcome of the complaint at agreed times for a minimum period of 12 months.

Escalating Complaints to Regulatory Authorities in Northern Ireland

As a registered nursing agency, we are regulated by The Regulation and Quality Improvement Authority (RQIA) for our operations in Northern Ireland.



The RQIA is the independent body responsible for monitoring and inspecting the availability and quality of health and social care services in Northern Ireland and encouraging improvements in the quality of those services. The RQIA do not investigate complaints but can be contacted for advice or signposting at:

The Regulation and Quality Improvement Authority

7th Floor, Victoria House

15-27 Gloucester Street

Belfast

BT1 4LS

Tel: 028 9536 1990 (9am-4pm)

Email: info@rqia.org.uk

Website: <https://www.rqia.org.uk/>

If you wish to make a complaint/raise a concern, or are dissatisfied with a service, you can get practical support to help you make a complaint from the Patient and Client Council. You can contact a patient and client support officer at:

Tel: 0800 917 0222

Email: Info.pcc@pcc-ni-net

Website: <https://patientclientcouncil.hscni.net/>

If you remain dissatisfied, you can then bring your concerns to the Northern Ireland Public Service Ombudsman at:

Progressive House

33 Wellington Place

Belfast

BT1 6HN

Tel: 02890 233821

Freephone: 0800 343424

Email: nipso@nipso.org.uk

Website: <https://nipso.org.uk/>

If a complaint relates to abuse, exploitation or neglect, then the Safeguarding Vulnerable Groups Policy and Procedural Guidance will be activated. Where immediate danger exists or the situation warrants immediate action, we will



ensure any necessary medical assistance has been sought and refer the situation immediately to relevant HSC Adult Protection Gateway Service or PSNI.

Escalation to the NMC

Whilst Florence will report complaints relating to malpractice, adult/child protection or an event that requires notification, complaints of this nature can also be raised by colleagues, service users or members of the public directly. Anyone can raise a concern if they feel the safety of service users or the public is at risk. It then becomes their duty as a regulator to decide whether the nurse is fit to practise.

The NMC has their own complaints procedure that can be found on their website at www.nmc.org.uk.

Recording, Review & Analysis

A written log of all complaints will be maintained including details of each individual complaint, the actions taken to resolve it and the outcome. The Governance Lead will also review complaints on a monthly basis to identify any trends or patterns and where appropriate make changes to our standard processes to prevent re-occurrence and improve service as part of our Quality Assurance system. This will also form part of management reporting and will be an agenda point for discussion at quarterly Governance meetings.

6. Monitoring and Compliance

The policy will be reviewed every 3 years by the Governance Team, or earlier if there are any changes in the legislation, registration requirements or Company policy.

The Head of People Operations & Governance will routinely review complaints, investigations, lessons learned and actions taken to ensure adherence to this policy.



7. Policy Changes and Version History

| Date | Reviewed changes |
|-------------|--|
| 02/09/2024 | Registered manager name change & updated leadership team |
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Appendix A - Policy Summary

Things you should know:

1. Florence recognises that there will be occasions when customers, users of the platform and others may be dissatisfied with aspects of the care and services provided.
2. Dealing with complaints in a timely manner reduces the risk of escalation and increases the possibility of finding a satisfactory resolution to the problem.
3. Comments made on internal Florence social media sites may be considered and dealt with as complaints, unless they are a part of a group of complaints of a similar pattern, whereby they may be considered as Whistleblowing scenarios.

Things you should do:

1. Any users of the Florence platform who may have complaints about the care delivered within the care service setting have a responsibility to make their concerns known to Florence and to the Registered Manager of the Organisation.
2. Complaints raised in relation to care professionals with the registered care service; or care professionals on the Florence platform, or members of the Florence Central team; can be directed to complaints@florence.co.uk

