Save Face

Internal Complaints Policy

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Part 1 - Introduction

Save Face will always attempt to find a speedy and amicable resolution to any concern raised before invoking a formal process.

1.1 Statement of Purpose

- To support the patient in making their complaint
- To monitor compliance with the complaints process
- To identify areas for improvement and make recommendations
- To monitor implementation of service improvements, when recommended
- To include complaints made and process of resolution in clinic audit
- To identify areas of risk and take appropriate steps to prevent harm to the public and protect the reputation and credibility of the register and those on it
- To gather data on the nature of complaints in aesthetic practice to inform best practice standards
- Where there is evidence to indicate impairment of fitness to practice, to refer to the appropriate statutory body and/or regulator

1.2 Exclusion Criteria

If the complaint does not concern a registrant, information will be retained for audit and if appropriate, general advice and support may be provided in the interests of public education.

Unless the Governance Board considers that there are exceptional circumstances, information received by Save Face about a registrant will not be considered under these procedures if the individual was not on the register at the time or over two years have elapsed since the conduct occurred or since the date on which the complainant became aware of the conduct, whichever is the latest.

If the complainant is another practitioner or a member of the public who has no personal experience of the registrant, Save Face will include the complaint in the clinic portfolio for audit but not instigate investigation unless within the context of other complaints.

If the complaint is based on hearsay, without supporting evidence.

If the complainant wishes to remain anonymous and anonymity would prevent proper investigation and/or the ability of the registrant to respond and address.

If the complaint has already been addressed and closed.

Where the registrar has received information about a Registrant and that Registrant is already the subject of an inquiry by the police or other body, or there are ongoing criminal or civil proceedings, the investigation or referral may be deferred until the inquiry or proceedings have concluded.

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1.3 Vexatious Complaints

Save Face recognises the need to consider every complaint on its merits and investigate and manage following the complaints policy. Save Face officers appreciate that a complainant's behavior does not, in itself, mean that a complaint is unjustified. Save Face appreciates that complainants may be frustrated and in distress, so it is important that complaints are properly identified and managed with a degree of patience and sensitivity.

Vexatious complaints are distressing for staff, and are time-consuming, unnecessarily diverting valuable resources from their primary purpose of public protection and accountability to our standards.

A complaint may be considered as vexatious where the complainant;

- Persists in pursuing a complaint that has already been investigated and provides no new information
- Prolongs contact by continually changing the substance of the complaint or by continually raising further concerns or questions whilst the complaint is being addressed
- Fails to clearly identify the substance of the complaint or the precise issues which need to be investigated, despite reasonable efforts to assist the complainant to do so
- Makes a high number of unjustified or unsubstantiated complaints
- Complains solely about trivial matters to an extent that is out of proportion to their significance
- Makes excessive contact with Save Face or seeks to impose unrealistic or unreasonable demands or expectations on resources.
- Persists in seeking an outcome that we have explained is unrealistic or unreasonable
- Harass or verbally abuse or otherwise seek to intimidate staff dealing with their complaint
- Raising numerous, detailed but unimportant questions, insisting they are all answered
- Making excessive demands on time with lengthy phone calls or emails expecting immediate responses
- Submitting falsified documents
- Refuse to accept documented evidence as fact
- A combination of some or all of these features

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1.4 Possible Actions

The registrar will be satisfied that the complaint is being or has been investigated and documented according to the Save Face complaints policy.

The registrant will be given a warning in writing to explain the behaviour which is causing concern and provide them with an opportunity to change their behaviour. An explanation will be provided of the actions the organisation might need to take if the behaviour persists.

Any action undertaken in this policy will be agreed upon in consultation with the registrar and the clinical director.

The reasons for the decision and actions will be documented and provided in writing to the complainant.
The complainant will be advised;

- Why we have taken the action
- What action we are taking
- The duration of the action

Restrictions on contact may be imposed and should be proportionate and tailored to manage the particular issues identified.

The complainant may be advised Save Face will not respond to or acknowledge any further contact from them on the matter of their complaint.

In cases where it is decided that a complaint is vexatious, and there can be no expectation of meeting the purpose of the complaints policy, the matter may be closed with the agreement of the registrar and the clinical director.

Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, Save Face may report the matter to the police or take legal action and may do so without prior warning to the complainant.

The Governance Board will be provided with an annual report giving information about service users who have been treated as vexatious as per this policy.

New complaints will be addressed on their merits.

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Part 2 - Committees and Panels

2.1 Personnel Engaged with the Management of Complaints

Save Face recognises the need to separate the investigation, adjudication, and appeals stages of the process to prevent bias or conflict, and to make the process transparent and fair. Save Face has separated the stages and arranged that different personnel is engaged in each stage of the process.

Each of the panels is comprised of a member of the Governance Board; a professional person, not associated with Save Face, who has an interest in Health Care and is engaged in a discipline that is not related to Aesthetic Medicine; and a layperson.

Individuals with specialist knowledge or expertise may be appointed as required by the nature of the complaint.

Save Face shall maintain a pool of individuals who have been pre-approved by the independent advisory board. Each panel shall comprise a minimum of three and a maximum of five individuals, with a quorum requiring three.

2.2 The Governance Board

- View Governance Board here
- To inform, review, and approve policy, process, and standards
- To monitor and audit process and procedure
- To monitor outcomes
- To recommend reviews and changes
- To have representation at the panel level

2.3 The Registrar and Clinical Director

- Determine risk category
- Liaise with registrant and complainant
- Gather information/evidence
- Investigate and manage complaints
- Compile summary reports for audit, approved by panels.
- Provide support to the Complaints Panel and Governance Board for high-risk category complaints

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2.4 The Complaints Panel

- To review complaints against registrants which warrant referral to a statutory register
- To make determinations on complaints that identify serious breaches in Save Face Standards

2.5 Appeals Panel

- Will hear appeals against the findings and determinations of the Complaints Panel and
- Consider any new evidence if:

In the light of that evidence, the original committee or panel would have reached a different decision;

- Notwithstanding that evidence, the original panel ought to have reached a different decision on the material before it.

In cases where no fresh evidence is admitted, if they decide that the original committee or panel ought to have reached a different decision on the material before it;

- Has the authority to vary any requirements placed upon a practitioner by the Complaints Panel if the appeal hearing finds acceptable mitigation or grounds that are considered acceptable and reasonable.
- The Appeals Panel shall be comprised of different members from the Complaints Panel.

2.6 Restoration Panel

Shall consider any application to be restored to the register.

2.7 Ethics Committee

In accordance with its stated intention to involve lay people and members of the public in its affairs and its governance, and to extend the transparency and demonstrate the fairness of its operations, Save Face has constituted an Ethics Committee.

The Ethics Committee, consisting of four laypersons, will be convened to hear complaints against Save Face itself or its personnel. The Ethics Committee will also consider conflicts of interest or potential conflicts of Interest where they arise or are notified.

The Ethics Committee is formed of four laypersons that have no association with Save Face, and apart from the reimbursement of their paid expenses, they have no financial association with or other interest in Save Face. The Ethics Committee will examine issues raised about Save Face itself, or its personnel.

The findings of the Ethics Committee will be entered by the registrar into the agenda of a Board Meeting so that the Directors and Governance Board can be informed and learn from the

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outcome. The Directors are pledged to accept the findings and recommendations of the Ethics Committee and will seek to address the issue to prevent the conflict from arising in the future. Panels will be comprised of a pool of volunteers pre-approved by The Governance Board.

Part 3 - Complaint Categorisation by Risk Assessment

All complaints reported will be investigated by the clinical director and supporting evidence gathered for audit and reports.

The procedure is followed according to policy and managed according to risk.

LOW ***- The health and safety of the client have not been compromised - concerning the standards.***

- A known side effect that has been explained at consent and will resolve spontaneously.
- A known complication which the clinician has offered and is competent to manage.
- Treatment was administered appropriately, safely, in a safe environment, by a qualified clinician but client expectations have not been met.
- Identify potential risks which can be addressed (e.g., consent and patient information)

Possible Sanctions Issues for Low-Risk Category Complaints:

- Make recommendations to the practitioner/ clinic for improvement which will be reviewed upon accreditation renewal.

MEDIUM ***- The health and/well-being of the client has been directly compromised or service has fallen below acceptable standards***

- The health/well-being of the patient has been compromised resulting in justifiable distress
- Actual and potential breach of accreditation standards identified which can be addressed for improvement.

Possible Sanctions Issues for Medium-Risk Category Complaints:

- Make recommendations to the practitioner/ clinic for improvement and require evidence on how changes are implemented within a set time frame They will be suspended from the register until they have implemented the recommended improvements.

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HIGH - ***Identifiable risks to patient safety and/or serious misconduct***

- Likely breach of (criminal) legislation
- Potential risk to other patients accessing this service
- Likely breach of Professional Standards
- Behavior that may harm the reputation of Save Face and/or the registrants
- Findings by a statutory regulator will be reflected on Save Face register
- A registrant who has frequently been the subject of complaints
- High-risk complaints will be referred to the Complaints Panel and Statutory Register as required.

Possible Sanctions Issues for High-Risk Category Complaints:

- The Clinical Director will prepare a report including all of the details and evidence for referral to the registrant's statutory regulator. The registrant will be suspended from the register pending outcome from the regulator.
- If the regulator finds that there has not been a breach of their professional standards, then the registrant can apply for restoration to the register.

Part 4 - Procedure Policy for Complaints

For complaints concerning registrants, in the first instance, registrants should be provided with an opportunity to resolve the complaint as per complaints policy.

On receipt of a written complaint (completion of online form) about a registrant, the registrar shall first consider whether the nature of the complaint is such that it should be accepted.

The registrar will ensure receipt of the complaint is acknowledged in writing, within 48 hours. The acknowledgment will include an explanation of how we intend to proceed according to the nature of the complaint and a time frame for subsequent communication.

The registrar will notify the registrant that a complaint has been received and provide a copy of that complaint, requesting information and evidence as appropriate, to be provided within 14 days.

Registrants are required to cooperate with the complaints policy and process and provide the information requested within the time frames set.

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When a registrant does not co-operate and without prior agreement and terms, the registrar may issue a temporary suspension pending satisfactory compliance with the complaints procedure.

OR escalate and treat the complaint as a High-Risk Complaint.

The registrant may voluntarily withdraw from the register if they do not wish to cooperate with the complaints policy and process, but this will be noted on the register as 'Withdrawn from register', and the policy will be followed as far as possible or necessary to its proper conclusion for the benefit of the patient.

Within 28 days, the Clinical Director will review the evidence regarding the complaint and compile a summary report and conclusion which shall be provided to the patient and registrant.

The report shall include;

- The key elements of the complaint that were investigated with reference to The Standards
- The evidence provided
- Any breaches or lapses of standards identified
- Any recommendations to improve standards
- Any actions taken by the registrant to prevent further complaints of this nature
- Any follow up and time frame

The complainant will receive, in writing a response to their complaint.
The response shall include;

- An expression of regret for the harm/distress suffered
- An objective summary of the concerns raised by the consumer and an acknowledgment of any subjective information
- An explanation of what and how the complaint has been investigated
- Details of any findings concerning Save Face Limited (SFL) standards
- If relevant, a summary of the factors contributing to the adverse event and information on what has been done and will be done to avoid repetition of the adverse event, and how this will be monitored.

4.1 Procedure policy for Medium Risk complaints

Following the standard procedure, if a complaint is identified as medium risk the Clinical Director will issue a warning and notify the Registrar.

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Warning

- A warning will require written undertaking from the registrant to comply with any recommendations, and the registrant will be monitored for a period set by the Clinical Director and agreed by the Registrar.
- The annual renewal assessment will include a detailed review and require confirmation that the recommendations have been implemented.
- At the conclusion of the period set by the Complaints Panel, the Clinical Director will review and determine whether the recommendations have been met and the warning can be expired.

4.2 Procedure policy for High-Risk complaints

The registrar may determine to instigate an interim suspension pending the outcome of either a Statutory Registers investigation or the Complaints Panel decision.

- High-Risk complaints will be referred to the statutory register and the Complaints Panel.
- Save Face will not duplicate the due process conducted by a statutory register.
- Save Face will share all information and evidence required by the statutory register and may serve as a witness.
- On completion of any investigation or hearing with a statutory register, the complaints panel will be provided with a report. If a registrant is struck off a statutory register they will be removed from the Save Face register.
- It is not the intention of Save Face to duplicate any formal investigatory process conducted by The Statutory Regulators.

Where a formal allegation against a registrant has been considered by the Clinical Director and the preliminary evidence is such that a statutory regulator should be informed, the clinical director will seek advice from regulators regarding reporting a concern or complaint to them.

The matter shall be referred to the appropriate Statutory Body.

A report to the regulator will be submitted as advised,

The registrar will provide a copy of the report to the registrant who will be advised a referral has been made to their statutory regulator.

Pending any outcome from a statutory register, and where the complaint has been categorised as high risk, the case will be anonymised and presented to the Complaints Panel for a consensus decision.

The panel will consider the evidence and determine whether to: impose an interim suspension or removal.

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Where Save Face has received information other than in a writing, that there is evidence of a serious (High Risk) breach by a registrant of the standards, and the matter is not already the subject of any inquiry by the police or other body or there are no on-going criminal or civil proceedings, the registrar may become the complainant and seek the co-operation of the registrant and any relevant third party. The registrar may also consider issuing an Interim Order.

Any determination or findings from a statutory regulator which would apply to the registrant's practice in aesthetic medicine would be applied to the registrant's status on the Save Face register.

An internal hearing will only be conducted if the statutory register has determined the registrant shall remain on the statutory register and the registrant wishes to be restored to the Save Face Register.

The purpose of an internal hearing shall be to determine whether the registrant shall remain on the Save Face register.

In advance of the hearing, panel members shall receive in writing;

- The key elements of the complaint that were investigated with reference to The Standards
- The evidence provided
- Any breaches or lapses of standards identified
- Any recommendations to improve standards
- Any actions taken by the registrant to prevent further complaints of this nature
- Any follow up and time frame

The registrant will be notified in writing with an explanation, a copy of the report which will be submitted to the panel and informed of the date the panel will meet.

The Panel shall meet within 28 days of notification

Role of complainants in hearings

Where a case proceeds to a hearing, complainants may have a role by:

- Providing a written statement and supporting evidence.
- Attending (remotely or in person) to give evidence or answer questions, where this is necessary and proportionate.
- The decision on whether a complainant is invited to participate is based on the relevance of their evidence to the issues being considered and on safeguarding their wellbeing.

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Support for complainants

Where complainants are involved in a hearing, Save Face will:

- Explain the process clearly in advance, including what to expect, who will be present, and the likely timeframes.
- Provide information in plain language and offer opportunities to ask questions before the hearing.
- Allow a supporter to accompany the complainant (e.g. friend, family member, or advocate) where appropriate.
- Make reasonable adjustments for accessibility needs (e.g. remote attendance, breaks, alternative formats).
- Keep complainants updated on the progress and outcome of the case, within the limits of confidentiality and data protection.

The panel shall consider the evidence and determine whether:

- The suspension should be lifted,
- The suspension should remain until conditions are met, and what those conditions should be or
- The registrant should be permanently removed.

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4.3 Interim Suspension

The registrant's profile will be removed from the public search.

Maybe actioned by The Registrar pending an outcome decision from The Complaints Panel.

Will be actioned either because the Complaints Panel determines the complaint is high risk or the concerns have been referred and accepted as meeting the standard to justify an investigation by the regulator.

The complaints panel may recommend permanent removal from the Save Face register, irrespective of any outcome from the statutory register's investigations and hearings.

The interim suspension will require that the registrant's profile be removed from the practitioner search pending the outcome from the statutory regulator's FTP investigation and hearings.

Should a temporary suspension be determined, the registrant will be notified in writing and asked to remove any reference to Save Face accreditation from their website, pending review- the terms of which will be advised by the Complaints Panel.

The registrant may choose to appeal the decision as per 2.5

4.4 Permanent Removal

If the evidence suggests there has been harm caused to a patient and a risk of harm to others or the reputation of the register and professions,
If a registrant has been struck off their statutory register

If the complaints panel determines the conduct of the registrant is such that the Save Face Standards have been breached and there is no indication of, or willingness to amend behavior.

The registrant may choose to appeal the decision, providing they maintain their professional, statutory registration, as per 2.5.

An appeal shall be limited to a review of the decision of the original committee or panel and consideration of any fresh evidence.

4.5 Audit for Governance

The Clinical Director shall complete an audit report quarterly, which shall be presented to The Governance Board to identify and inform any necessary review of Save Face standards, policies, or guidance documents.

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The Audit Report shall include;

- Summaries of the complaints made (anonymised)
- Summaries of the investigations
- A summary of the findings
- Copies of reports
- Data analysis

4.6 Applying for Restoration to the Register

If a practitioner has been removed from the register and wishes to reinstate their accreditation, they must apply for restoration to the register.

Applications for restoration can only be made if the practitioner has an active registration with the following statutory bodies: NMC, GMC, GDC and GPhC.

If a practitioner has been struck off by their professional regulator and the strike off order remains in place, then they are not eligible to apply for restoration.

If the practitioner has been suspended by their professional regulator, then they are unable to apply for restoration until the suspension has been lifted by their professional regulator and has demonstrated they are fit to practice.

The complaints panel will consider the application for restoration, which will determine whether the applicant should be able to apply for readmission to the register.

The purpose of a restoration process is to consider whether, looking at the circumstances that led to removal of the registrant, the applicant is fit practise as a Save Face Accredited practitioner. When considering restoration applications, the panel's role is to make sure that the health, safety and wellbeing of members of the public is protected, and that public confidence in the register, and proper standards and conduct are maintained.

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