

CLIENT COMPLAINT MANAGEMENT

GROUP POLICY

PURPOSE

Mediclinic is committed to managing complaints in a manner consistent with our values.

The purpose of this policy is to:

- Establish a transparent and responsive clear complaints-handling process.
- Ensure complaints are handled objectively, fairly and confidentially
- Ensure complaints are received and responded to in a timely manner, and
- Facilitate continuous improvement informed by robust analysis of complaints
- Assure Service Recovery through managing the complaint so as to ensure a positive perception/impression of Mediclinic

APPLICABILITY

This policy applies to:

- All Mediclinic employees
- Anyone wanting to submit a complaint against Mediclinic or the services of their commissioned providers.

This policy does not apply to any work-related grievance of an employee.

POLICY STATEMENT

Mediclinic is committed to taking all complaints seriously and recognises and respects everybody's right to provide feedback or lodge a complaint about our services.

We will treat all complaints fairly, with impartiality and objectively, while maintaining confidentiality.

We will ensure mechanisms are in place to receive, consider and resolve complaints related to its business in a timely and effective manner.

An assessment of complaints will be undertaken in a manner consistent with our values and code of conduct.

Where a complaint is received regarding a service we commission, we will address the complaint and we also expect our subcontracted service providers to manage the complaint, as stipulated in the Service Level Agreements, in adherence to the Mediclinic Group Complaint Management Policy.

GUIDING PRINCIPLES

- **Objectivity and Fairness** – Mediclinic will recognise and respect everybody’s right to provide feedback or lodge a complaint and will treat all complaints fairly with impartiality and transparency. Any assessments will be undertaken in a manner consistent with Mediclinic values and code of conduct.
- **Accessibility** – Mediclinic will ensure the complaint management process and policy is publicly accessible to complainants and published on the Mediclinic website. This includes information on how and where to lodge a complaint, and how complaints are managed.
- **Responsiveness and Efficiency** – Mediclinic will record, track, acknowledge and process complaints in a timely manner and will ensure the level of assessment is proportional to the complexity of the complaint.
- **Confidentiality** – Mediclinic will ensure personal information that identifies individuals is only disclosed as permitted under the relevant privacy laws, secrecy provisions and confidentiality obligations.

HOW TO LODGE A COMPLAINT:

All complaints regarding Mediclinic, or a service commissioned by Mediclinic can be submitted either directly to a staff member, verbally, telephonically, in writing, via social media, or via the Mediclinic website.

The vast majority of issues causing concern can be handled quickly and in an uncomplicated manner. In most cases these issues can be resolved through informal discussions with appropriate staff members. Even if an issue is able to be resolved informally, all staff are required to log issues through our Complaints Management System so we are able to identify any systemic issues arising and take appropriate rectification action.

DEFINITIONS

TERM, ACRONYM OR ABBREVIATION	DEFINITION
Client	Patient, family and / or visitor, person seeking/receiving advice and/or services, from Mediclinic
Complaint	An expression of dissatisfaction made to Mediclinic, related to our services or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected
Complainant	Client or other person or entity on behalf of the client who submits a complaint
Complaint Addressed	The problem-solving process was followed, feedback was provided to the complainant and the issue was closed. The client may or may not be satisfied
Complaints Management System	Client Relationship Management system used to record and manage complaints
Complaint management process	The culture, processes and structures that are directed towards the effective management of complaints of clients to enhance service

TERM, ACRONYM OR ABBREVIATION	DEFINITION
Coordinator	The person responsible to coordinate the complaint management process at the hospital/clinic
Investigator	The person responsible for investigating the complaint
Recipient	The first person to receive the complaint from the complainant

RESPONSIBILITIES

Effective complaint management requires a whole-of-organisation approach with clear points of accountability for reporting and feedback

PERSON	RESPONSIBILITIES
All Staff	<ul style="list-style-type: none"> Understand and comply with the Mediclinic Complaints Management System, including ensuring any complaint they receive are reported and addressed. Participate in complaints management processes under the direction of management staff.
Recipient (any Mediclinic employee)	<ul style="list-style-type: none"> Receives the complaint in a friendly, non-defensive and empathetic manner Considers the context of the complaint and where applicable, refers the complaint immediately to the manager / head of department or coordinator, for further management If possible, registers the case on the Complaint Management System Manages the complaint, where applicable If the complaint is related to a clinical safety event, reports it to the relevant manager immediately

Coordinator (relevant role per division)	<ul style="list-style-type: none"> • Coordinates the complaint management process • Considers the context of the complaint, with the assistance of relevant individuals where necessary, to establish whether it is clinical or non-clinical • Ensures that the clinical or non-clinical complaint is investigated by an appropriate investigator • Ensures that the Hospital General Manager/Hospital Director and Patient Safety Manager at the hospital are alerted to any complaints that might have a legal implication. • Ensures that the Corporate Communication Department is notified and consulted for advice if there is a risk of significant reputational damage • Coordinates internal investigations of complaints, if applicable • Keeps applicable management members informed • Ensures that final feedback is provided to the complainant • When a complaint was referred through a senior member of the company, not directly involved, ensures that he/she receives feedback on the outcome of the complaint • Ensures timely management and resolution of complaints in line with Mediclinic standards stipulated in this policy • Captures all complaints on the Complaints management system
Investigator	<ul style="list-style-type: none"> • Investigates the complaint objectively, fairly, confidentially and timeously • Establishes the facts associated with the complaint • Provides appropriate feedback • Captures continuous feedback on Complaint Management System • Adhere to SLA timelines

Manager / Head of Department	<ul style="list-style-type: none"> • Trains and empowers staff to resolve complaints promptly in accordance with Mediclinic’s Complaint Management System. • Encourages all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Regularly discusses the management of complaints • Ensures that complaints are dealt with in accordance with Mediclinic values • Assists and supports personnel to resolve complaints at the point of service • Deals with complaints referred to their department through discussion with the complainant and relevant personnel • Objectively reviews information obtained from complaints, identifies areas of improvement or risk and makes recommendations regarding possible changes • Ensures that the rights of patients are upheld throughout the complaint management process • Provides appropriate feedback to the complainant • The Hospital General Manager/Hospital Director / Patient Safety Manager will ensure that the Divisional Legal Department is consulted for complaints received from regulatory authorities, cases with legal implications, legal action is threatened or the client requests compensation (including discounts / writing off of accounts) prior to feedback to the complainant • Ensures that all staff is aware of the policy content and skilled in handling patient feedback
Communication Department at divisional Corporate Offices	<ul style="list-style-type: none"> • Informs the Hospital General Manager/ Hospital Director and coordinator of a complaint, if applicable • Captures complaint on Complaint Management System • Provides feedback on a complaint to the coordinator, where applicable

REPORTING

Complaints and actual or proposed improvements to practices, forms an important part of Mediclinic’s internal reporting and improvement planning processes and a monthly client experience report will be submitted to the Group Services EXCO, reflecting the number of compliments, queries and complaints received by each division.

- A taxonomy of the complaints received will be included in the report, as well as trends identified by the divisions and information on serious complaints with severe harm/financial impact/reputational risk.
- A standard report will be submitted to Group services by the 5th of each month.

STANDARDS

Action	Time frame
Provide verbal acknowledgement (direct face-to-face contact with patient) of a complaint received from or about an in-patient, and from or about a client who are still at the facility, for example at the Emergency Department/ Outpatient Clinic.	Within 2 hours
Provide verbal acknowledgement of a written or telephonic complaint and agree on a time frame for the next communication where the patient is not an in-patient, or has left the facility	Within 24 hours (Business days)
Consult Divisional Legal Department for advice with all information if the complaint may give rise to legal implications, legal action is threatened, the complaint originates from regulatory authorities or the client requests compensation (including discounts / writing off of accounts) prior to giving feedback to the complainant (including undertakings when feedback will be given so as to jointly determine any deadlines)	Upon receipt of complaint (According to Legal Department guidelines)
Notify and consult Corporate Communication Department if there is a risk of significant reputational damage	Within 2 hours
Investigate the complaint, and where appropriate, give verbal feedback (direct contact to the complainant)	Within 7 days
Provide feedback even if the complaint is not yet resolved	Within the time frame agreed upon with the client
Report all complaints which require investigation and formal feedback to the coordinator	On receipt
Corporate Office Communications Department handles complaints on social media	Immediately – in accordance with escalation procedure

STANDARDS, CONTINUED

Written feedback / communication must comply with Mediclinic standards.

Formal feedback must be placed onto on a Mediclinic/Hirslanden letterhead ,be signed by either/or the Coordinator, Head of Department or Hospital General Manager/Hospital Director and must be sent in PDF format.

When dealing with complaints Mediclinic will, in accordance with our values:

- Treat clients' complaints confidentially. Confidentiality applies with respect to both information relating to the person making the complaint, and, if relevant to a person against whom a complaint is made. Mediclinic will use its reasonable endeavours to maintain the confidentiality of information throughout the complaints process.
- Treat clients courteously with respect, tact, fairness, and empathy.
- Personally identifiable information about a complainant will only be made available for the purpose of addressing the complaint and (unless the complainant consents) will be actively protected from disclosure.

HISTORY AND VERSION CONTROL

History

VERSION NO	EFFECTIVE DATE	AUTHOR	DETAILS OF UPDATE
1	2019-07-01	Amanda Appelgryn	Initial release
2	2024-07-18	Amanda Appelgryn	Review
CONTRIBUTORS	NAME	DESIGNATION	
Version 1	Béatrice Schwark	Head of Quality Management: Hirslanden	
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New version

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Details of update		
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APPROVAL AND SIGN-OFF

Approved by

DEPARTMENT/ AREA/ GROUP/ FORUM	REPRESENTATIVE NAME	SIGNATURE	DESIGNATION	DATE SIGNED
Mediclinic Group	Dr R Toua		Group Chief Clinical Officer	2024-07-18