Making a complaint about dental services: how the six principles of good complaint handling relate to the CQC's inspection framework and the GDC's Standards for the Dental Team

The CQC's inspection teams use a framework to assess healthcare services, using key lines of enquiry (KLOEs) and prompts where they are appropriate.[1] The CQC uses this framework to assess dental providers against the regulations set out in the Health and Social Care Act 2012.[2]

The GDC's Standards for the Dental Team sets out the standards of conduct, performance and ethics that govern dental professionals.[3]

This document provides an easy reference guide to the CQC's KLOEs and GDC's Standards for the Dental Team, in the context of the principles for making a complaint about dental services.[4]

Notes

Throughout this document, the CQC's reference to 'people' includes adults, young people and children, where applicable.

Throughout this document, the GDC defines 'must' and 'should' in the following ways:

- 'Must' is used where the duty is compulsory.
- 'Should' is used where the duty would not apply in all situations and where there are exceptional circumstances outside your control that could affect whether, or how, you can comply with the guidance. Should is also used when the GDC is providing an explanation of how you will meet the overriding duty.

The principles of good feedback and complaints handling for dental patients were developed jointly by the following organisations: Association of Dental Administrators and Managers, Association of Dental Groups, British Association of Dental Nurses, British Association of Dental Therapists, British Dental Association, British Orthodontic Society, British Society of Dental Hygiene and Therapy, Bupa Dental Care, Care Quality Commission, CFC Underwriting, CODE, Dental Complaints Service, DDU, Dental Protection, Dental Technologists Association, Department of Health and Social Care, LDC Confederation, General Dental Council, Health Education England, MDDUS, mydentist, NHS Digital, NHS England, Orthodontic National Group, Orthodontic Technicians Association, Parliamentary and Health Service Ombudsman, Simplyhealth, Society of British Dental Nurses. This work was informed by the views of dental patients.

1 Care Quality Commission (2018). Key lines of enquiry, prompts and ratings characteristics for healthcare services. Available at: https://www.cqc.org.uk/sites/default/files/20180628%20Healthcare%20services%20KLOEs%20prompts%20and%20characteristics%20FINAL.pdf. [Accessed 19 September 2018].
2 Health and Social Care Act 2012. Available at: http://www.legislation.gov.uk/ukpga/2012/7/contents/enacted. [Accessed 8 October 2018].
3 General Dental Council. (2013). Standards for the Dental Team. Available at: https://www.gdc-uk.org/api/files/NEW%20Standards%20for%20the%20Dental%20Team.pdf. [Accessed 19 September 2018].
4 Information and resources on the principles for making a complaint about dental services are available from the websites of the contributing organisations listed above.

Principle 1:
All of your feedback is important to us

Organisation	Code	KLOE / prompt / Standard
All feedback is welcomed, such as what we did well, what we could do better, or any other feedback		
CQC	C2	How does the service support people to express their views and be actively involved in making decisions about their care, treatment and support as far as possible?
We will use your feedback to help us improve, and we will show you how we have learned		
CQC	R1.2	Where people's needs and choices are not being met, is this identified and used to inform how services are improved and developed?
CQC	W3.2	Is the culture centred on the needs and experience of people who use services?
CQC	W3.5	Does the culture encourage openness and honesty at all levels within the organisation, including with people who use services, in response to incidents? Do leaders and staff understand the importance of staff being able to raise concerns without fear of retribution, and is appropriate learning and action taken as a result of concerns raised?
CQC	W7.1	Are people's views and experiences gathered and acted on to shape and improve the services and culture? Does this include people in a range of equality groups?
You can use our complaints procedure to provide feedback. If you don't want to do this, speak to a member of staff		
GDC	5.1.5	You should make sure that your complaints procedure allows information that can beused to improve services to pass back to your practice management or equivalent.

Principle 2:

We want to make it easy for you to raise a concern or complain, if you need to

Organisation	Code	KLOE / prompt / Standard
Information about our complaints procedure is easy to find, without you having to ask		
CQC	R4.1	How well do people who use the service know how to make a complaint or raise concerns and how comfortable do they feel doing so in their own way? How are people encouraged to make a complaint, and how confident are they to speak up?
GDC	5.1.5	You should make sure that your complaints procedure is displayed where patients can see it – patients should not have to ask for a copy.
You can write to us or tell us in person		
CQC	R4.2	How easy is it for people to use the complaints process or raise a concern? Are people treated compassionately and given help and support, by using accessible information or protection measures, if they need to make a complaint?
We will take your complaint seriously		
CQC	R4	How are people's concerns and complaints listened and responded to and used to improve the quality of care?
GDC	5.2	You must respect a patient's right to complain.
Our complaints information also tells you how to raise a complaint about us with another organisation		
GDC	5.1.5	You should make sure that your complaints procedure provides information on other independent organisations that patients can contact to raise concerns.
GDC	5.3.11	If the patient is not satisfied despite your best efforts to resolve their complaint, you should tell them about other avenues that are open to them, such as the relevant Ombudsman for health service complaints or the Dental Complaints Service for complaints about private dental treatment.

Principle 3:
We follow a complaints procedure and keep you informed

Organisation	Code	KLOE / prompt / Standard
We will tell you who is dealing with your complaint and when to expect a response		
CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.1	You must make sure that there is an effective complaints procedure readily available for patients to use,and follow that procedure at all times.
GDC	5.1.1	It is part of your responsibility as a dental professional to deal with complaints properly and professionally. You must: • ensure that there is an effective written complaints procedure where you work; • follow the complaints procedure at all times; • respond to complaints within the time limits set out in the procedure; and • provide a constructive response to the complaint.
GDC	5.1.4	If you work in a private practice, including private practice owned by a dental body corporate, you should make sure that it has a procedure which sets similar standards and time limits to the NHS (or equivalent health service) procedure.
GDC	5.3.4	You must respond to complaints within the time limits set out in your complaints procedure.
We will keep you informed of the progress of your complaint, including information on any delays		
CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.3.5	If you need more time to investigate a complaint, you should tell the patient when you will respond.
GDC	5.3.6	If there are exceptional circumstances which mean that the complaint cannot be resolved within the usual timescale, you should give the patient regular updates (at least every 10 days) on progress.

You should feel confident we are following our complaints procedure

CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.3.1	You should give the patient a copy of the complaints procedure when you acknowledge their complaint so that they understand the stages involved and the timescales.

Principle 4:

We will try to answer all your questions and any concerns you raise

Organisation	Code	KLOE / prompt / Standard

It should be clear to you what happened, and why

GDC	5.3.7	You should try to deal with all the points raised in the complaint and, where possible, offer a solution for each one.
GDC	5.3.10	You should respond to the patient in writing, setting out your findings and any practical solutions you are prepared to offer. Make sure that the letter is clear, deals with the patient's concerns and is easy for them to understand.

Our response should be empathetic in tone and coordinated

GDC	5.1.2	You should make sure that everyone (dental professionals, other staff and patients) knows about the complaints procedure and understands how it works. If you are an employer, or you manage a team, you must ensure that all staff are trained in handling complaints.
GDC	5.2.1	You should not react defensively to complaints. You should listen carefully to patients who complain and involve them fully in the complaints process. You should find out what outcome patients want from their complaint.
GDC	5.3.2	You should deal with complaints in a calm and constructive way and in line with the complaints procedure.

We will deal with your complaint in the time we said we would

CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.3.4	You must respond to complaints within the time limits set out in your complaints procedure.
GDC	5.3.5	If you need more time to investigate a complaint, you should tell the patient when you will respond.

Principle 5:

We want you to have a positive experience of making a complaint

Organisation	Code	KLOE / prompt / Standard

You should feel we have followed a clear procedure in the time we said we would

CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.3.1	You should give the patient a copy of the complaints procedure when you acknowledge their complaint so that they understand the stages involved and the timescales.

You should not be treated differently if you complain

CQC	R4.4	How are people who raise concerns or complaints protected from discrimination, harassment or disadvantage?
GDC	5.1.7	You should keep a written record of all complaints together with your responses. This record should be separate from your patient records so that patients are not discouraged from making a complaint.
GDC	5.3.3	You should aim to resolve complaints as efficiently, effectively and politely as possible.

You understand how the outcome of your complaint was reached

CQC	R4.3	How effectively are complaints handled, including ensuring openness and transparency, confidentiality, regular updates for the complainant, a timely response and explanation of the outcome, and a formal record?
GDC	5.3.10	You should respond to the patient in writing, setting out your findings and any practical solutions you are prepared to offer. Make sure that the letter is clear, deals with the patient's concerns and is easy for them to understand.

You feel you could raise a complaint again if needed, and could recommend our procedure to others

CQC	R4.1	How well do people who use the service know how to make a complaint or raise concerns and how comfortable do they feel doing so in their own way? How are people encouraged to make a complaint, and how confident are they to speak up?

You feel we have listened to you and have acted in a fair way

CQC	R4	How are people's concerns and complaints listened and responded to and used to improve the quality of care?
GDC	5.3.9	If a complaint is justified, you should offer a fair solution. This may include offering to put things right at your own expense if you have made a mistake.

You know what further help is available if you are unhappy with the way we have handled your complaint

GDC	5.1.5	You should make sure that your complaints procedure provides information on other independent organisations that patients can contact to raise concerns.
GDC	5.3.11	If the patient is not satisfied despite your best efforts to resolve their complaint, you should tell them about other avenues that are open to them, such as the relevant Ombudsman for health service complaints or the Dental Complaints Service for complaints about private dental treatment.

Principle 6:
Your feedback helps us to improve our service

Organisation	Code	KLOE / prompt / Standard
We are learning all the time from your feedback and complaints		
CQC	R4.5	To what extent are concerns and complaints used as an opportunity to learn and drive continuous improvement?
GDC	5.1.6	Complaints can be an opportunity to improve your service. You should analyse any complaints that you receive to help you improve the service you offer, and share lessons learnt from complaints with all team members.
We show you how your feedback and complaints are listened to and acted upon		
CQC	S6	Are lessons learned and improvements made when things go wrong?
CQC	S6.3	How are lessons and themes identified, and is action taken as a result of investigations when things go wrong?
GDC	5.3.8	You should offer an apology and a practical solution where appropriate.
All members of our dental team are committed to improving the service we provide		
GDC	S6.4	How well is the learning from lessons shared to make sure that action is taken to improve safety? Do staff participate in and learn from reviews and investigations by other services and organisations?
GDC	5.1.6	Complaints can be an opportunity to improve your service. You should analyse any complaints that you receive to help you improve the service you offer, and share lessons learnt from complaints with all team members.