

COMPLAINTS PROCEDURE

Policy Statement

Pure Healthcare Group values the opinion and feedback of its employees, workers, candidates and clients and is committed to improving service quality and resolving issues raised in response to feedback, suggestions, complaints or service issues.

We believe that our customer service is what differentiates us from our competitors, and as such we are continuously seeking ways to improve the service that we give to both our clients and candidates.

Our complaints procedure is designed to comply with applicable legislation, regulatory requirements and best practice guidance across the United Kingdom. We are committed to ensuring that complaints are handled fairly, consistently, openly and in a timely manner. 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. Information from complaints will be used to continuously improve the quality of our services.

The UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025 govern the processing of personal data in the UK. You have the right to complain directly to us if you consider that we have breached data protection laws because of the way we have handled your personal data (or the personal data of someone you are acting on behalf of). This Policy explains your right to complain and how we will handle your complaint.

Scope of the Policy

This policy applies to complaints relating to all aspects of the company's service, data handling, policies and procedures as well as clinical complaints. All employees are required to comply with this policy when dealing with complaints (and if required complaint escalation) irrespective of whether they are raised by a customer, candidate, worker or other 3rd party. Our complaints procedure is open and accessible to all and as such is publicised to all clients and candidates (in a range of formats if required).

Pure Healthcare Group is committed to handling all complaints in an accessible, fair, transparent and timely manner. Complaints will be handled confidentially and information will only be shared where necessary to investigate and resolve the complaint, or where required by law.

Roles & Responsibilities

Registered Manager:

Faye Carson (Registered Manager) is responsible for handling all clinical complaints received by our clients and agency workers. Her responsibilities include:

- Receiving, investigating and responding to clinical complaints in a fair, timely and impartial manner.
- Ensuring that all clinical complaints are appropriately recorded, reviewed and managed in accordance with company policies and regulatory requirements.
- Leading investigations into concerns relating to the quality, safety or delivery of care and clinical services.
- Liaising with clients, agency workers, healthcare professionals and other relevant parties to gather information and resolve complaints.
- Identifying any risks, trends or recurring issues arising from complaints and implementing corrective actions where required.
- Ensuring lessons learned from complaints are shared with relevant staff to support continuous improvement in service quality and patient safety.
- Monitoring the effectiveness of actions taken following complaint investigations.
- Escalating serious concerns, safeguarding issues or incidents to the appropriate authorities and regulatory bodies where necessary.
- Ensuring complainants are kept informed of the progress and outcome of investigations.
- Supporting a culture of openness, accountability and continuous improvement throughout the organisation.

Data Protection Officer (DPO):

Peter Newbury (Operations Director) is our company Data Protection Officer and is responsible for handling data protection complaints. His responsibilities include:

- Receiving, investigating and responding to complaints relating to the processing of personal data.
- Ensuring compliance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- Acting as the primary point of contact for individuals raising concerns about how their personal data has been collected, used, stored or shared.
- Liaising with relevant departments to investigate data protection concerns and implement corrective actions where necessary.
- Monitoring and reporting on data protection compliance across the organisation.
- Managing personal data breach investigations and coordinating any required notifications.
- Providing advice and guidance to staff on data protection obligations and best practices.

- Acting as the contact point for the Information Commissioner's Office (ICO) where required.

Clients:

Clients are encouraged to:

- Raise concerns or complaints as soon as possible to enable a prompt investigation.
- Provide clear and accurate information regarding the complaint, including relevant dates, times and details.
- Cooperate with any investigation by providing additional information when requested.
- Treat staff involved in the complaints process with courtesy and respect.
- Inform the company if they require any reasonable adjustments or support to make a complaint.
- Communicate their desired outcome where appropriate.
- Notify the company if they are satisfied with the resolution or wish to escalate the complaint.

Staff

All staff members are responsible for:

- Providing high-quality care and services in accordance with company policies, procedures and professional standards.
- Taking concerns and complaints seriously and responding professionally and respectfully.
- Reporting complaints, concerns or incidents promptly to their line manager or the appropriate person.
- Cooperating fully with complaint investigations and providing accurate information when requested.
- Maintaining confidentiality throughout the complaints process.
- Implementing any actions, recommendations or improvements identified as a result of complaint investigations.
- Supporting a culture of openness, learning and continuous improvement.
- Escalating any safeguarding concerns, patient safety issues or serious incidents immediately in line with company procedures.
- All staff must recognise potential data protection complaints and report them to the Data Protection Officer as soon as possible, regardless of whether they are received verbally, in writing, via email, social media or any other communication channel.

Agency Workers

Agency workers are responsible for:

- Delivering services in accordance with company policies, client requirements and professional standards.
- Reporting any complaint, concern or dissatisfaction raised by a client, service user or colleague to the appropriate manager without delay.
- Cooperating fully with complaint investigations and providing honest, accurate and timely information.
- Maintaining professionalism and confidentiality throughout the complaints process.
- Participating in any meetings, reviews or investigations relating to a complaint where requested.
- Implementing any learning or corrective actions identified following an investigation.
- Raising concerns about unsafe practice, safeguarding issues or risks to service users through the appropriate reporting channels.

Response Times for All Complaints

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.
- Pure Healthcare Group will implement and action an immediate action plan in relation to the complaint. (i.e. additional training, working restrictions etc.)
- Interviews will be held within 48 working hours of acknowledgment unless there are extenuating circumstances.
- A response will be made to Complainant within 48 hours of completing interviews. We will take all reasonable and practicable steps to resolve the complaint within 10 business days 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.

All documentation, evidence, interviews, correspondence and outcomes are documented and retained on within the Senior Management folder and a notification is made to the appropriate regulator, professional body, commissioning organisation or statutory authority.

A tag is made on the agency workers recruitment file to notify the sales team on whether;

- There is an open complaint on the candidate
- They have been referred to profession regulatory body or authority following an investigation
- They have received a complaint that has since been closed and whether they can or cannot work following the outcome
- The candidate can or cannot work while under investigation

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 Directors are 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 in writing or by telephone to the following individual who is fully trained to receive and deal with operational complaints:

Name & Job Title:	Peter Newbury, Operations Director
Telephone No:	02071399999
Email Address:	peter.newbury@purehealthcare.co.uk
Postal Address:	Pure Healthcare Group, 30 Crown Place, London, EC2A 4EB

Complaints received through social media or other online channels will be reviewed and responded to in accordance with this procedure. Where necessary, we may request an alternative secure communication method to protect confidentiality and personal information.

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 Pure Healthcare Group 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/GDPR. This information will be recorded in our complaints register.

We will investigate the complaint and interview relevant parties as appropriate. Written statements will be obtained from those interviewed and a summary report will be written. 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 in writing 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.

Data Protection Complaints Procedure

Pure Healthcare Group is committed to protecting personal information and complying with the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and any other applicable data protection legislation. Individuals have the right to complain directly to us if they believe that we have breached data protection legislation in relation to the way we have collected, used, stored, retained, shared or otherwise processed their personal data, or the personal data of someone they are authorised to act on behalf of.

Examples of data protection complaints include, but are not limited to:

- The way we have responded to a Subject Access Request (SAR) or other data rights request.
- Concerns regarding the security of personal information, including actual or suspected data breaches.
- Concerns regarding the accuracy of personal information held by the organisation.
- Concerns regarding how personal information has been collected, stored, used, shared or retained.
- Concerns regarding the lawful basis for processing personal information.
- Any other matter relating to an individual's rights under data protection legislation.

Complaints that do not relate to data protection matters will be handled under the appropriate section of this Complaints Procedure.

Data protection complaints should be submitted to:

Name & Job Title: Peter Newbury, Operations Director
Telephone Number: 02071399999
Email Address: peter.newbury@purehealthcare.co.uk
Postal Address: Pure Healthcare Group, 30 Crown Place, London EC2A 4EB

Complaints may be submitted in writing, by email, by telephone, in person or through any other communication channel used by the organisation.

Reasonable adjustments will be made where required to support individuals in making or participating in a complaint investigation. Individuals requiring additional support should inform us when submitting their complaint.

Data protection complaints will be acknowledged as soon as practicable and, where possible, within 2 business days of receipt, the complaint will be referred to the Data Protection Officer (DPO) without delay. We will investigate and respond without undue delay and keep complainants informed of progress throughout the investigation. The DPO will:

- Acknowledge receipt of the complaint.
- Review the nature of the complaint and determine the scope of the investigation.
- Gather relevant information and documentation.
- Liaise with relevant departments, employees, workers, clients and third parties where necessary.
- Keep the complainant informed of progress throughout the investigation.
- Ensure the complaint is handled fairly, objectively, confidentially and without undue delay.

All staff members are responsible for recognising potential data protection complaints and reporting them to the Data Protection Officer as soon as possible, regardless of how the complaint is received.

Information relating to the complaint will only be shared where necessary to investigate and resolve the matter, or where disclosure is required by law.

Where a complaint is submitted on behalf of another individual, evidence of authority to act on that person's behalf may be requested before the complaint is investigated. Where necessary, proof of identity may also be requested before personal information is disclosed or discussed during the investigation.

Where a complaint relates to personal data processed by one of Pure Healthcare Group's third-party service providers, contractors or data processors, we will liaise with that organisation as necessary to obtain information relevant to the complaint and support a thorough investigation. Any information sharing will be carried out in accordance with applicable data protection legislation and contractual arrangements.

Following completion of the investigation, the complainant will be informed of:

- The findings of the investigation.
- Whether the complaint has been upheld in whole or in part.
- Any actions taken or proposed to resolve the matter.
- Any lessons learned or improvements identified as a result of the complaint.
- The reasons for any decision not to take further action.

Where additional time is required to complete the investigation, the complainant will be informed of the reasons for the delay and provided with an updated timeframe.

If a complainant remains dissatisfied with the outcome of a data protection complaint, they have the right to raise their concerns with the Information Commissioner's Office (ICO).

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113
Website: www.ico.org.uk

Nothing in this procedure prevents an individual from raising concerns directly with the Information Commissioner's Office (ICO) at any time. The ICO is the UK's independent authority responsible for upholding information rights and enforcing data protection legislation.

Clinical Complaints Procedure

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

- The behaviour, competence or performance of a healthcare worker.
- A concern relating to a healthcare worker's registered status, experience, background or training.
- An allegation of abuse or neglect.
- Breaches of relevant codes of conduct (including those of relevant regulatory bodies 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 worker or employee within a clinical environment).

Our Clinical Complaints Procedure operates in accordance with applicable NHS standards, healthcare regulations, professional codes of conduct and recognised best practice guidance across the United Kingdom.

Healthcare workers are advised of their obligations to report any complaint made by a patient, 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 in writing or by telephone and then followed up in writing to the following individual who is fully trained to receive and deal with clinical complaints:

Name & Job Title:	Faye Carson (Band 7 Registered Nurse)
Telephone No:	02036339753
Email Address:	Faye.Carson@purehealthcare.co.uk
Postal Address:	Head Office – Pure Healthcare Group, 30 Crown Place, London EC2A 4EB Northern Ireland Office - Pure Healthcare Group, Scottish Provident Building, Office 231, 7 Donegall Square West, Belfast BT1 6JH

Receipt of the complaint will be acknowledged immediately pending investigation.

Information will be requested regarding who is making the complaint together with the nature of the complaint. We will request details of

- The background of the issue.

- The name(s) of the individuals involved.
- Specifics relating to dates, times and locations where the incident(s) took place.
- Witnesses to the incident(s).

The Registered Manager will ensure that the customer is notified immediately, and where appropriate, the appropriate regulator, professional body, commissioning organisation or statutory authority and Police may also need to be notified to aid our investigation and comply with our legal and best practice obligations.

The Registered Manager will investigate the complaint and interview individual parties as appropriate including the Complainant and healthcare worker about whom the complaint is being made. The healthcare worker will be fully informed of the complaint(s) relating to him/her and will receive a written copy of the complaint (unless it is inappropriate to do so). Written statements will be obtained from everyone interviewed in relation to the complaint including the healthcare worker concerned.

The Registered Manager will review all supporting information that we hold on the healthcare worker 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 healthcare worker 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 healthcare worker(s) concerned (where appropriate) are kept abreast of progress in making good or resolving the complaint.

Action to resolve the complaint will be documented and shared with all parties. This may include reinstatement of the healthcare worker to termination of the assignment and exclusion from future work with us. All parties will receive a written 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

appropriate regulator, professional body, commissioning organisation or statutory authority (and if appropriate the Police).

Pure Healthcare Group Complaints Escalation Process

Should the Complainant be dissatisfied with any aspect of the handling of their complaint or the outcome they should contact the Director, by outlining the details in full, to:

Tony Constantinides
Director
Pure Healthcare Group
11th Floor,
30 Crown Place
London
EC2A 4EB

The complaint will then be investigated by the Director, who will propose a course of action. The Director will continue to review the outcome of the complaint at agreed times for a minimum period of 12 months.

Escalation to the REC

In the event that the response to a complaint relating to professional standards provided by Pure Healthcare Group is unsatisfactory, a letter may be addressed to the Recruitment & Employment Confederation (REC), outlining the details in full to:

The Professional Standards Manager
Recruitment and Employment Confederation (REC)
Dorset House
First Floor, 27-45 Stamford Street
London
SE1 9NT

The complaint will then be investigated under the REC complaints and disciplinary procedure. This procedure can be obtained by visiting www.rec.uk.com.

Escalation to Regulatory Bodies

Whilst Pure Healthcare Group 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, patients or members of the public directly. Anyone can raise a concern if they feel the safety of patients or the public is at risk.

Depending on the nature of the complaint, concerns may be referred to the relevant professional regulator including, but not limited to:

- Nursing and Midwifery Council (NMC)
- Health and Care Professions Council (HCPC)
- General Medical Council (GMC)
- General Pharmaceutical Council (GPhC)
- Social Work England
- Scottish Social Services Council (SSSC)
- Northern Ireland Social Care Council (NISCC)
- Care Inspectorate Wales (CIW)
- Care Quality Commission (CQC)
- Regulation and Quality Improvement Authority (RQIA)

Recording, Review & Analysis

A written record of all complaints will be maintained, including details of each complaint, the investigation undertaken, actions taken to resolve the complaint and the final outcome. A complaints log will be maintained and reviewed by senior management on at least a quarterly basis.

Complaint records will include, where applicable:

- The date the complaint was received.
- The name and contact details of the complainant.
- The nature and category of the complaint.
- The date the complaint was acknowledged.
- Investigation notes, witness statements and supporting evidence.
- Correspondence and communications relating to the complaint.
- Actions taken during the investigation.
- The outcome of the complaint.
- Any corrective, preventative or improvement actions identified.
- Details of any escalation to regulatory bodies or external organisations.
- Dates of closure and review.

All complaint information will be stored securely and treated confidentially in accordance with applicable data protection legislation and the organisation's Data Protection Policy.

Complaint records will be retained only for as long as necessary in accordance with the organisation's data retention schedule and legal obligations.

Pure Healthcare Group will conduct regular analysis of complaints, including quarterly and annual reviews, to identify:

- Trends or recurring themes.
- Areas of risk.
- Opportunities for service improvement.
- Training and development needs.
- Potential safeguarding or patient safety concerns.
- Opportunities to improve policies, procedures and working practices.

Findings from complaint reviews will be incorporated into the organisation's Quality Assurance and Governance processes and will form part of management reporting and review meetings.

Lessons learned from complaints will be shared with relevant employees, workers and managers to support continuous improvement and help prevent recurrence.

Where appropriate, complaints data may be reviewed alongside incidents, safeguarding concerns, audits and feedback to identify wider organisational trends and improvement opportunities.

Review

This procedure will be reviewed annually, or sooner where required following legislative, regulatory or organisational changes.