

POLICY III-95	Patient/Resident Concerns Resolution Process	DOMAIN People and Teams
SLT Sponsor: Chief Quality and Privacy Officer Policy Lead(s): Manager, Patient Relations		Date Approved: April 9, 2021
		Date Effective: May 12, 2021
		Date of Next Review: May 2024

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NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definition section

Policy Statement:

Covenant Health will provide courteous, professional and appropriate responses to concerns. All concerns resolution activity shall embed elements of respect, fairness, objectivity and transparency, and in good faith, shall attempt to resolve concerns in a timely manner.

Patients, **family**, or **alternate decision-makers** have a right to express concerns about their health experience or services provided. Visitors (i.e. individuals not connected to the patient) have a right to express concerns about care that they have witnessed. Covenant Health promotes an environment where the public can voice their concerns/complaints without the fear of retribution.

Purpose Statement:

To facilitate a clear, easily accessible, fair, consistent, transparent and timely process for reporting **concerns** within Covenant Health.

To ensure compliance with Alberta Patient Concerns Resolution Process Regulation (124/2006) and alignment with Alberta Health Services' Provincial Patient Concern resolution processes.

To support and promote improvements in in patient/resident/client¹ care through the Patient Concern Resolution Process (hereafter referred to as PCRCP).

Applicability:

Responding to concerns and requests is a responsibility of all staff, medical staff, and management. All individuals acting on behalf of Covenant Health are expected to respond to concerns in a manner that is grounded in the Health Ethics Guide and rooted in the organizational values of Compassion, Social Justice, Respect, Integrity, Collaboration and Stewardship.

Complainants have an obligation to communicate in a respectful and constructive manner and a responsibility to collaborate in resolving concerns. The complainant is to provide sufficient information in writing, or verbally, as they are able, to consent for an investigation of concerns.

Responsibility:

All Covenant Health facilities, staff, medical staff, students, volunteers and any other persons acting on behalf of Covenant Health.

Operational leaders at all sites are responsible for review of concerns and the related decisions.

¹ Hereafter, all references to 'patients' includes residents and clients

Operational leaders at Covenant Health continuing care facilities are also responsible to ensure that residents and their families are aware of their right to establish self-governing councils in alignment with the Resident and Family Councils Act. The role of the Patient Relations department is to facilitate the PCRP, as required by the Alberta Patient Concerns Resolution Process Regulation (124/2006). The Patient Relations department also provides a centralized point of intake within Covenant Health for individuals to express their feedback regarding their healthcare experience.

The role of the Chief Medical Officer, or designate, is to investigate the concern in accordance with Part 6 of the Covenant Health Medical Staff Bylaws (Triggered Initial Assessment and Triggered Review), to ensure that there is procedural fairness for the complainant, affected medical staff and Covenant Health, and to fulfill the requirements identified in this policy/procedure.

Principles:

Public feedback provides a valuable source of information, which supports continuous quality improvement. The PCRP provides important opportunities for organizational and individual learning and is an essential component in understanding the patient and family experience.

Most concerns are easily and effectively resolved at the point of service and do not require a formal review process or the involvement of the Patient Relations department. In these situations, an informal resolution process is appropriate. If repeated minor concerns are expressed in a particular program area, time frame or with a specific patient or resident, a formal process is recommended.

Several principles uphold the concerns resolution process and help to ensure fairness, throughout, including the engagement of all stakeholders, the investigation process and concerns resolution. These principles reflect and express our commitment to Covenant Health's foundational values.

Respect

Accessibility, Transparency & Confidentiality/Privacy

- **Accessibility** -- A respectful process for responding to complainants is founded on a clearly identified avenue in which to raise and pursue resolution to concerns or to make requests. A commitment to accessibility also requires that concerns be addressed by those with sufficient responsibility and authority to meaningfully redress and respond to the situation.
- **Transparency**—Transparency in the administration of complaints resolution is essential to fostering trust, good will and demonstration of respect for all involved in a concern. Effective communication and clarity about the investigative process, timeliness, participants, rationale for involvement (e.g. accountability and responsibility), and management of expectations acknowledges basic human needs for information in the face of uncertainty.
- **Confidentiality and Privacy**—Respect for confidentiality and privacy must be demonstrated throughout the complaints resolution process. This principle requires that the resolution process and those who investigate concerns, balance the confidentiality of the complainant (including freedom from reprisal) with the privacy of the individuals named in the concerns.

Integrity

Responsiveness and Accountability

- **Responsiveness**—Timely and constructive response to patient/resident concerns reflect our commitment to integrity. Although a fair and thorough examination of a concern requires time, undue bureaucratic delays and burdensome administrative procedures only serves to reinforce distrust in the health system and the concerns resolution process. The evaluation of the effectiveness and fairness of the concerns process is not based solely on complainant satisfaction or agreement with the outcome.
- **Accountability**— Roles and corresponding responsibilities should be clearly articulated. Fairness in the patient concerns process requires accountability among all stakeholders according to their relative responsibilities. Staff, physicians and administrators within their own commitments to safe, effective and quality care are accountable to ensure that concerns are competently and reasonably addressed. Complainants— patients, residents, substitute decision-makers, or family members—are accountable to participate in good faith in the concerns resolutions process and accept reasonable limits as defined by the process or outlined through an outcome decision.

Collaboration

Subsidiarity & Quality Improvement

- **Subsidiarity**—In keeping with our call to work collaboratively with stakeholders, the concerns resolution process must seek to address challenges that arise in the provision or administrative of care at the most appropriate level. Whenever possible, solutions to patient resident concerns should be initiated at the appropriate level, including initial point of care—which demonstrates respect for those involved and empowers individuals.
- **Quality Improvement**—The expressed concerns of our patients and residents afford invaluable feedback about how to improve the care we provide. The care of current and future patients and residents is improved by addressing concerns through a fair, transparent, and genuine resolution process.

Stewardship

Reasonableness

- **Reasonableness** - The patient concerns resolution process must be reasonable, thoughtful and judicious. The decisions outcomes must be logical, understandably connected to the rationale and evidence, and identified through the concerns investigation process. Establishing 'reasonableness' at the outset of a concerns investigation is important for fairness. 'Reasonableness' naturally defines limits to the investigation process and the range of tolerable decision outcomes associated with any given situation.

Definitions:

Complainant means a person who brings forward a concern. This may be a patient or someone acting on behalf of, or in the interest of, a patient/resident.

Concern means a written or verbal expression of dissatisfaction that may be related to:

- patient, resident, family or visitor experience;
- the provision of goods and services to a patient;
- a failure or refusal to provide goods and services to a patient;
- terms and conditions under which goods and services are provided to the patient by Covenant Health or by a service provider under the direction, control or authority of Covenant Health.

It may also include dissatisfaction with professional practice and/or an allegation of unprofessional conduct. The concern may be clinical or non-clinical and may be directed at any member of the organization or the organization as a whole. The concern may also include dissatisfaction with a Covenant Health owned or operated facility.

Concern resolution may differ with individual concerns and complainants and can mean:

- Mutual acceptance of and satisfaction with the outcome
- The complainant may not be satisfied or accepting but understands the outcome
- The complainant may remain dissatisfied and non-accepting of the outcome and/or the resolution process
- There may be no way in which follow up or investigation is possible

Formal review means a structured process, with defined steps, as outlined in this procedure, used to manage concern resolution.

Informal process are those in which a concern can be resolved to the satisfaction of complainant and relevant stakeholders with minimal action or documentation.

Medical staff means physicians, dentists, oral and maxillofacial surgeons, podiatrists, or scientist leaders who have a Covenant Health medical staff appointment

Relevant Covenant Health Policy and Policy Support Documents:

A. Policies:

- III-45 [Responding to Adverse Events, Close Calls and Hazards](#)
- III-5 [Reporting / Investigating Legal Actions and Potential Legal Actions](#)
- 1.6 [Preferential Access](#)
- III-75 [Abuse of Patients or Residents](#)
- III-70 [Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoings](#)
- III-85 [Media Relations](#)

	<p>II-155 Social Media</p> <p>VII-B-350 Advance Care Planning Goals of Care Designation</p> <p>X-35 Disclosure of Personal or Health Information to Third Parties</p> <p>X-70 Use of Electronic Monitoring, Recording Devices and Cameras by Patients, Residents and Alternate Decision-Makers</p>
B.	<p>Procedures:</p> <p>III-95.PROC.1 Patient Resident Concerns Resolution Procedures</p>
C.	<p>Guidelines:</p>
D.	<p>Job aids:</p>
E.	<p>Standards:</p>
<p>References:</p> <p>Exceptional Situation Consultation Protocol and Request Form</p> <p>Patient Resident Concerns Resolution Process (PCRP) Concern Feedback Received at the Point of Service</p> <p>Patient Concerns Resolution Process - Key Operational Standards</p> <p>Covenant Health Medical Staff bylaws</p> <p>AHS Family Presence and Visitor Guidelines</p> <p>Misuse of the Patient Concerns Resolution Process (Frivolous or Vexatious Concerns) Protocol</p> <p>Urgent Notification of Emerging Issues Protocol</p> <p>Mental Health Act</p> <p>Patient Concerns Resolution Process Regulation, 124/2006</p> <p>Resident and Family Councils Act, Chapter R-16-7, effective April 1, 2018</p> <p>Patient Concerns/Complaints Resolution, 2007 Health Quality Council of Alberta Patient Concerns Management; A Framework for Alberta, 2017 Health Quality Council of Alberta</p> <p>Health Ethics Guide, Third edition</p> <p>Covenant Health Code of Conduct: Our Commitment to Ethical Integrity</p> <p>Just Workplace Framework</p> <p>Covenant Health Mission Discernment Tool</p>	
<p>Past Revisions:</p> <p>January 11, 2019</p> <p>October 10, 2014</p>	