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Information about Complaints, Significant Event Audits and Serious Adverse Incidents

Please provide a copy of what existed in the Belfast Trust prior to January 2020 in relation to conducting a "Significant Event Audit", for short "SEA". On the 28th January 2020, the Belfast Trust introduced a document called "Key points to consider when conducting a Significant Event Audit within BHSCT". I would like a copy of what existed before the introduction of the "key points to consider" document on 28/01/2020.

Prior to issue of the document referred to in January 2020, the following Trust Policies were in place that are still operational – Procedure for Investigating an Incident (excluding SAIs) and Serious Adverse Incident (SAI) Procedure.

Within the BHSCT SAI Procedure, there was a section that directed the reader to a NPSA link for guidance on SEA methodology and, within the BHSCT Investigating an Incident (excluding SAIs) there was a section that also makes reference to SEA methodology.

In relation to the BHSCT Procedure for Serious Adverse Incidents (SAIs), it refers to the attached regional guidance issued by the HSCB / PHA in 2016. This provides further information around the completion of a SEA.

Documents mentioned above are attached in a separate document.

1. How many complaints were received by the Belfast Trust in 2018, 2019, 2020 and 2021?

The table below illustrates the number of formal consented complaints received by Belfast Trust in the years specified:

Year	Number of Complaints Received
2018	1898
2019	1735
2020	1178
2021	1419

2. How many of the complaints (in total above) were investigated using the SEA methodology for investigation.

There are circumstances where a service area chooses to investigate a complaint using the Significant Event Audit methodology. The complaint remains under investigation as a complaint. The complaint is not suspended. The Significant Event Audit is the method that is used to investigate the complaint.

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Belfast Trust does not maintain records of the number of occasions where this has been done and it would require a manual search of records to establish this number. The time and resource required to undertake this manual search would be too great to allow us to respond to this question on this occasion.

The Trust considers that the cost of retrieving the information would be above the 'Appropriate Limit', as defined by the Freedom of Information Act under Section 12. Section 12 of the Freedom of Information Act makes provision for public authorities to refuse requests for information, where the cost of dealing with them would exceed the appropriate limit. The limit has been specified as £450 for public authorities such as Belfast Trust. This represents the cost of one or more persons spending 18 hours in determining whether we hold the information, locating, retrieving and extracting this information.

3. Apart from a complaint and a Serious Adverse Incident, what else does the Belfast Trust investigate/review using the SEA methodology?

Belfast Trust, as outlined in the NPSA guidance, would support "Conducting an effective Significant Event Audit (SEA) allows you and your team to highlight and learn from both strengths and weaknesses in the care you provide".

4. Why does the Belfast Trust have a complaints procedure if there is a regional HSC Complaints procedure already in existence?

The Department of Health directs how the management of complaints is to be undertaken across Health and Social Care and sets out these directions in "The Health and Social Care Procedure Directions (Northern Ireland) 2009". These directions define the legal duty on Trusts with regard to the investigation of complaints, including the "requirement to make arrangements" for Health and Social Care bodies such as Health and Social Care Trusts. It is a relatively brief document.

The Department of Health also publishes the "Guidance in Relation to the Health and Social Care Complaints Procedure". This document describes in greater detail than the Directions, the actions expected of Health and Social Care Trusts and the standards that they are to maintain in the management of complaints.

Both of these documents define for HSC Trusts the actions they are to take and the arrangements they are to make to manage complaints. It follows that the Trust is required to develop a detailed operational policy that meets the requirements of the Directions and of the Guidelines and which describes in detail, and in the context of management structures and responsibilities within the Trust, the actions that are to be taken to ensure the effective management and oversight of complaints by the Trust.

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In answer to the question, it is a matter of degree and not of separate procedures. The Department of Health sets out the framework for all HSC Complaints Procedures and Health and Social Care bodies, including the Trusts, develop local procedures to ensure that the Trust implements complaints management within the framework required by the Department of Health.

5. Is the Belfast Trust Complaints policy the same as the HSC complaints procedure? If not, what are the differences between the two?

As described above in the answer to Question 4, the Trust Complaints Procedure is a detailed and operational description of how the Trust implements the Department of Health directions for the management of complaints in Health and Social Care. The Trust procedure contains more detail – as it is an operational document – but it operates fully within the parameters of the Department of Health Direction and Standards and Guidelines for the Management of Complaints.