

COMPLAINT POLICY AND PROCEDURE

Description: *This document outlines HVE Healthcare Assessments' Complaint Policy, including how efforts are made to resolve complaints, levels of review of complaints and time frames for consideration and decisions.*

Intent

The intent of the Complaint Policy is to demonstrate HVE's commitment to its customers, employees, persons served and visitors by providing the steps to be taken in the event a complaint is filed by an individual against an HVE Resource or the organization. The Policy initiates the steps to be taken by management once a complaint has been launched.

Guidelines

HVE recognizes that from time-to-time there will be complaints about the organization or its resources. HVE wants to ensure individuals with complaints are able to voice their concerns, but in order to do so, they should do so through proper channels of communication.

Regulations

Complaint against a HVE Resource

- The proper channel for an individual to voice a complaint against an HVE resource is to approach the following individuals in the order indicated:
 - The HVE resource (if appropriate) against whom the complaint is directed;
 - Department manager;
 - HVE Executive (Director of Operations and COO)
- The HVE Resource and Department Manager shall be informed of the complaint immediately and shall have an opportunity to respond verbally or in writing.
- If the complaint cannot be satisfactorily resolved by the individuals concerned, the complainant should inform the HVE Executive in writing, and the HVE Executive shall maintain a record of the complaint and resolution in our Issues and Opportunities Log which is maintained in our system under restricted Management access.
- If in the opinion of the HVE Executive Team member that the complaint is serious, a written and signed copy of the complaint must be provided to the President. In the event the complainant is unable to prepare a written complaint, the President may provide

assistance in preparing a statement, which is then signed by the complainant. The complainant shall be cautioned about potential risks of making a false or unsubstantiated complaint.

- The HVE Executive or the Department Manager shall maintain a record of the complaint and resolution and may choose to record the incident in the HVE Resource's personnel file, in which case the Resource shall be so informed and shall sign the documents indicating awareness that the item is being placed on file. The HVE Resource's written response to the complaint shall be recorded on the personnel file, upon request.
- If the complaint cannot be resolved by the HVE Executive, the matter shall be dealt with by Council (Management Team and the President). The complainant will be advised of all actions taken and the resolution.
- The HVE Executive Team shall ensure a protocol for the investigation and resolution of complaints is developed and Managers are informed of the process.

Organizational Complaint

- Any complaints made by an individual directly against the organization shall be filed immediately to Management by the complainant in writing and must be signed.
- A simple to use, Complaint form is available by request from our front reception.
- Management will review, investigate, and resolve the concerns of the complainant, while keeping written and signed copies of documentation along with the steps taken to resolve the matter.
- In the event that management cannot satisfactorily resolve the complaint, the complaint must be brought forth to the HVE Executive Team (i.e. Director, COO and President) who will determine the best way to handle the concern.
- The HVE Executive Team will keep a copy of the written and signed complaint, along with the steps taken to resolve the matter.

Complaints filed by an individual toward an HVE Resource or the organization will be handled immediately by appropriate personnel.

Complaint from Insurers

As per the FSCO O.Reg 90/14, Section 17:

HVE shall establish a process for addressing and resolving complaints from insurers in respect of the service provider's business systems and practices related to listed expenses.

If a complaint is received from an insurer regarding the business systems and practices related to listed expenses, the staff member in receipt of the complaint will bring it to the immediate attention of a member of the HVE Executive team (i.e. Director, COO). Should a member of the HVE Executive team be unavailable, the complaint should be brought to the attention of the President.

The HVE Executive member in receipt of the complaint will notify the other HVE Executive members of the complaint and launch an investigation into the complaint and communicate with the insurer regarding the findings of the complaint as per the timelines noted below. All details of the complaint, investigation and outcomes will be documented in writing. A plan will be made to address any problematic practices identified as a result of the investigation.

Timeframes

In the case that the complaint can be adequately addressed by the HVE Executive, the action timeframe to resolution is a maximum of 22 working days.

- 2 working days to respond to a complaint
- 5 working days to decide on a resolution method
- 15 working days to resolve the complaint

In the case that the complaint cannot be adequately addressed by the HVE Executive, an alternate dispute resolution (mediation) timeframe is a maximum of 47 working days:

- 2 working to respond to a complaint
- 5 working days to decide on a resolution method
- 5 working days to obtain permission from the parties to mediate
- 5 working days to assign a mediator
- 30 working days to complete the mediation

If satisfactory resolution cannot be achieved regarding complaints launched by an insurer regarding HVE's business systems and practices related to listed expenses, it is understood that the insurer may initiate a complaint to FSCO.

HVE will endeavour to resolve any issue/complaint expeditiously to the satisfaction of all involved, these timelines are provided as a guideline to this Policy.

Confidentiality

Confidentiality of any individual affected by a complaint under this policy shall be maintained, unless the client expressly consents otherwise. Complainants will be asked to submit all relevant documents to the HVE Executive to allow them to respond to the complaint and agree to allow the disclosure of these documents to people handling the complaint.

All documents related to a complaint, including the written complaint, witness statements, investigation notes and reports, and documents related to the complaint, will be securely maintained by the HR Department in a secured file.

Personal information must only be collected, used or disclosed when the collection, use or disclosure is necessary to administer this Policy. Personal information must be collected, used or disclosed in accordance with applicable policies or guidelines.

There must be no reference to a complaint under this Policy in an employee's human resource file unless disciplinary action was taken against the employee. When disciplinary action has been taken, retention of information in the employee's human resource file is subject to the applicable collective agreement or Archives Ontario retention schedules.

Reprisal

Every person is entitled to claim and enforce their right to services or a workplace free of harassment and/or discrimination. It is a violation of this Policy to discipline, criticise, ostracise, or otherwise negatively treat a person, or treat a person negatively by omission, because he or she has brought forward a complaint, provided information related to a complaint, or otherwise been involved in the complaint resolution process.

A complaint alleging reprisal may be made under this Policy, and persons engaging in reprisal are subject to disciplinary measures, up to and including dismissal.